



Community Services Block Grant (CSBG) Program
& State Management Plan - CFDA # 93.569



CSBG
FFY
2010

Community Services Programs
October 1, 2009 – September 30, 2010

**Community Services Block Grant Program (CSBG)
Wyoming State Management Plan**

**FFY 2010
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"Poverty is need. It is lack of opportunity... it is also helplessness to cope with hostile or uncaring or exploitive institutions. It is lack of dignity. And it is vulnerability to injustice... poverty is personal."

**R. Sargent Shriver
April 12, 1965**

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**Community Services Block Grant
Wyoming State Plan FFY 2010**

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OVERVIEW OF ATTACHMENTS (CSBG Operations Manual)

This Section follows the AAppendices@ Section, and is designed to assist grantees/service providers with information about CSBG Planning, with emphasis on Comprehensive or Strategic Planning and the ACommunity Action Plan@ as required; along with day-to-day program operations information and other applicable information. Please note revisions in the ACommunity Action Plan@, AThe Planning Process@, and AFinancial & Performance Reporting@ to incorporate instructions for meeting *WyōROMA* criteria (including the components of the State Strategic Plan and the Results-Oriented Management and Accountability (ROMA) Program).

I. FEDERAL FISCAL YEAR

This document is both an application and State Management Plan for the Community Services Block Grant (CSBG) Program for Federal Fiscal Year (FFY) 2010 (October 1, 2009 – September 30, 2010) to the United States Department of Health and Human Services (HHS), Office of Community Services (OCS). It has been prepared and submitted by the Wyoming Department of Health (WDH), Rural and Frontier Health Division (RFHD), Community Services Programs (CSP).

II. LETTER OF TRANSMITTAL

A cover letter to Ms. Josephine Robinson, Director of the Office of Community Services, is included with this application as Appendix A.

III. EXECUTIVE SUMMARY

CSBG STATE LEGISLATION

Title II of the "Community Opportunities, Accountability, and Training and Educational Services Act of 1998" (or the "Coats Human Services Reauthorization Act of 1998" - P.L. 105-285), the Community Services Block Grant (Subtitle B), through section 676 requires that the State shall prepare and submit to the Secretary of HHS an application and State Plan which contains provisions describing how the state will carry out the assurances and other requirements of the CSBG Act.

The application and State Plan are based on the provisions and requirements of the CSBG Act, Title VI, Subtitle B of the Omnibus Budget Reconciliation Act of 1981 (P.L. 97-35, as amended); the Human Services Amendments of 1994 (P.L. 103-252); the FFY 1996 CSBG Appropriation Legislation (P.L. 104-134); Code of Federal Regulations (C.F.R.) Title 45, Part 96; the Community Opportunities, Accountability, and Training and Educational Services Act of 1998 or the Coats Human Services Reauthorization Act of 1998 (P.L. 105-285); U.S. Department of Health and Human Services Block Grant Regulations; and the current Poverty Income Guidelines.

DESIGNATION OF LEAD STATE AGENCY TO ADMINISTER THE CSBG PROGRAM

The State of Wyoming, Department of Health (WDH), Rural and Frontier Health Division (RFHD), Community Services Programs (CSP) has been responsible for administering the Community Services Block Grant (CSBG) Program since its inception in 1982. The responsibility was originally mandated by Governor Ed Herschler through executive order; was reaffirmed through executive order by Governor Mike Sullivan, and further reaffirmed by Governor Jim Geringer by Executive Order 1995-9. The Director and State Health Officer of the Wyoming Department of Health is Brent D. Sherard, M.D., M.P.H, F.A.C.P and the Governor is Dave Freudenthal. A letter from Governor Freudenthal to Ms. Robinson is included as Appendix B providing delegation of authority to Dr. Sherard.

CSP will closely monitor and evaluate program activities of its eligible entities as well as subcontractors to ensure that contracted services and activities are provided efficiently, effectively, and with the intent of the CSBG Act and the State Plan.

CSP will expect substantial responsibility by eligible entities= governance boards, be they public or private sector, commensurate with the authority provided for the establishment of local priorities that achieve the objectives of the CSBG Program. This process will be a large factor in ensuring that local priorities will guide such process.

In addition to the CSBG Program, CSP also directly administers the Emergency Shelter Grant (ESG) Program, which is a categorical homeless program funded by U.S. Housing and Urban Development.

CSP participates actively in a diverse array of state level and local-level groups in the planning, coordination, implementation, monitoring, and evaluation of human services programs in Wyoming. Such groups include boards, commissions, task forces, advisory councils, and other configurations with the ultimate goal of self-sufficiency for low-income people.

PUBLIC HEARING REQUIREMENTS

Public Hearing:

Legal notices of local public hearings are placed in thirty (30) state newspapers prior to implementing the FFY 2010 Community Services Block Grant (CSBG) Programs. Press releases, which present more detail than the legal notices, are released to newspapers, TV stations, and radio stations as applicable.

Legislative Hearing:

Legislative hearings are conducted as authorized by legislative committees, to provide information to, and receive guidance from State Legislators. The most recent legislative hearing was held before the Joint Labor Health and Social Services Interim Committee in Sheridan, Wyoming on September 9, 2009.

Public Inspection of State Plan:

CSP will make this State Plan available for public inspection within the state in such a manner as will facilitate review of, and comment on, the Plan. Copies will be distributed to appropriate people and organizations, i.e., previous eligible entities, prospective eligible entities, subcontractors (service providers), state and local agencies, both in the public and the private sectors, State libraries, and others as appropriate. Comments on the proposed State Plan will be accepted and considered, be they written or verbal, but strong encouragement for written comments is emphasized. Such comments will be seriously considered before finalization of the State Plan. Newspaper ads will be prepared that encourage solicitation and comment on the Plan.

Because of the relatively small number of persons who work with human services in Wyoming, a very tight, close knit network is prevalent and "word-of-mouth" information about proposed programs and issues associated with them generally spreads the word in a truly amazing fashion. Further, the fact that the CSBG program is exceptionally flexible (as opposed to strict categorical programs), and because part of its purpose is to further coordinate all human services programs in the state, the CSBG is a very high-key and visible program. Consequently, requests for information and comments on the program occur routinely, aside from those solicited by CSP.

As is probably true in other states, particularly the extremely rural ones, Wyoming has a large number of private sector citizens who are traditionally involved in many aspects of human services programs through advisory councils, governing boards, task forces, commissions, and other such groups. Generally, these people are very active in terms of spreading the word about proposed programs and in involving their fellow townspeople.

The State fully intends to ensure that public participation remains at a high level. Essentially, these efforts consist of frequent media coverage, word-of-mouth, mail-outs, presentations, public hearings, legislative hearings, and on-site visits with local programs.

As has been the case since the CSBG=s inception in Wyoming in 1982, FFY 2010 eligible entities will be required to conduct public hearings in their local geographical areas relative to the use of local CSBG funds for the purpose of soliciting general citizenry input. Such hearings will be advertised in the respective newspapers for at least ten days prior to the scheduled hearing. In addition, strong encouragement is directed to the local eligible entities for advertising the local hearings through other means, i.e., notices posted at appropriate places and facilities.

The notifications of public hearings, and the conducting of such hearings, are formal requirements of the application process to the State CSP for CSBG funds.

Local applications for CSBG funding provide formal documentation of both the notification of hearings and the proceedings of such hearings. The position of the CSP is that this requirement is one of the most crucial in its requirements to local eligible entities and service providers.

IV. STATEMENT OF FEDERAL AND CSBG ASSURANCES

The State of Wyoming is required to certify annually to HHS, OCS that its CSBG Program will meet the requirement of the CSBG Act. Wyoming=s Department of Health Director and State Health Officer, Brent D. Sherard, M.D., M.P.H., F.A.C.P. has formally signed a letter of federal assurances, and of federal and certifications to HHS, OCS for the State of Wyoming=s FFY 2010 CSBG Program. These assurances and certifications (as applicable) will also be a formal requirement for local-level CSBG eligible entities (grantees), and subcontractors, and will serve to establish the overall mission, goals, and objectives of local-level CSBG activities. The State=s affirmation that the assurances and certifications= requirements are complied with and carried out will be through the contractual process as well as through monitoring of both state and local-level activities. A copy of the local-level certifications that must be submitted to CSP is included in this Plan in the AAppendices@ Section.

V. THE NARRATIVE STATE PLAN

ADMINISTRATIVE STRUCTURE

The Wyoming Community Services Programs (CSP) will not develop regulations, policies, procedures or other requirements beyond those absolutely essential and necessary to successfully carry out the provisions of the CSBG Act and the State Plan. Policies and procedures will be issued to local eligible entities and their subcontractors as needed. Such policies will be designed to assist local programs in meeting federal and state requirements. Further, CSP will assure that any federal and/or state regulations adopted affecting local CSBG programs during the grant period are provided to its eligible entities and subcontractors.

Clearly, CSP does not intend to impose unrealistic non-meaningful policies to local contractors and subcontractors; only when it is necessary in ensuring compliance with the intent of the CSBG Act and the State Plan. Such subsequent policies will be binding for CSBG eligible entities and subcontractors.

State Administrative Agency:

Purpose:

The purpose of Wyoming's CSBG Program is to provide assistance to local communities, through a combination of local governments, community action agencies, and neighborhood-based organizations, both in the public and private sectors, for the reduction of poverty, the revitalization of low-income communities, and the empowerment of low-income families and individuals to become fully self-sufficient. Such emphasis on self-sufficiency will also foster family stability, and community revitalization.

Mission Statement:

The Mission of Wyoming's CSBG Program is to use all available local, state, federal, and private resources to provide a range of services and activities to solve problems and remove obstacles caused by poverty conditions, thereby enabling low-income families and individuals to attain the skills, knowledge, and opportunities that they need to become economically self-sufficient. Such emphasis on self-sufficiency will also foster family stability, and overall community revitalization.

Vision Statement:

For the Wyoming Community Services Programs (CSP) to continue to be a highly effective organization and an active member of the national, state, and local community services network, both public and private sectors, and dedicated to promoting self-sufficiency and family stability for low-income people, as well as promoting and revitalizing healthy communities.

Goals:

The goals of Wyoming's CSBG Program are to:

- (1) reduce and/or eliminate poverty;
- (2) revitalize low-income communities; and
- (3) empower low-income individuals and families to become economically self-sufficient.

Objectives:

Objectives established to accomplish the goals of the Program are:

- (1) to strengthen community capabilities for planning and coordinating the use of a broad range of federal, state, local, and other resources (including the private sector), related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions;
- (2) the organization of a range of services and activities related to the needs of low-income individuals and families, so that these services and activities may have a measurable and potentially major impact on the causes of poverty in Wyoming's communities and ultimately help low-income people to achieve self-sufficiency;
- (3) to improve and expand the use of innovative and effective community-based approaches to attacking the causes and effects of poverty and of community breakdown;
- (4) to maximize participation of residents of low-income communities and members of the groups served by programs assisted through the CSBG Program to empower such residents and members to respond to the unique problems and needs within their communities; and
- (5) to broaden and strengthen the resource base of programs directed to elimination of poverty so as to secure a more active role in the provision of services for:
 - (a) private, religious, charitable, and neighborhood or community-based organizations; and
 - (b) individual citizens, and business, labor, and professional groups, who are able to influence the quantity and quality of opportunities and services for the poor.

Eligible Entities:

Only organizations that are formally designated as eligible entities by the Wyoming Community Services Programs (CSP) will be contracted with by the CSP for administration of local CSBG programs state-wide. The CSP will rule on local requests for eligible entity status based on the requirements of the CSBG Act with regard to eligible entities.

It is anticipated that the mix of public sector and private sector eligible entities will be fairly even. This should prove to be a unique mix in terms of planning and of providing CSBG services and activities to the state=s constituents.

In order to understand Wyoming=s current situation with eligible entities, one needs an historical perspective with regard to CSBG eligible entities in the past.

When the CSBG Act (Omnibus Budget Reconciliation Act of 1981 (P.L. 97-35)), was implemented in 1982, the State had only (2) community action agencies, and two (2) migrant and seasonal farmworker organizations. These were the two categories of organizations that the 1981 Act designated as eligible entities. Consistent with the Act, CSP allocated funds to only those jurisdictions (county areas) that contained the two community action agencies and the two migrant and seasonal farmworker organizations. The result was that only around 12% of the local jurisdictions (county areas) received the benefits of CSBG services and activities. Put another way, low-income people in need of CSBG assistance that resided in the "other 88% areas" did not receive CSBG assistance. As a result, the CSP, acting on behalf of Governor Ed Herschler, requested a waiver from the HHS/OCS to allow local governments (county commissions) to become eligible entities for the future, so that the entire state could receive the benefits of CSBG activities and services. In addition, a handful of other states also requested such waiver, essentially for the same reason (i.e., state-wide coverage of CSBG services) The waiver request was for county commissions to become eligible entities in addition to, not in place of, community action agencies. The CSP has always had a strong policy that community action agencies have strong preference over other agencies and organizations. After a hiatus of almost one year, the waiver was ultimately approved by the HHS.

Because of the waiver, Wyoming was then designated under the law as a "waiver state" and the CSBG immediately began providing CSBG services and activities in all geographical areas of the state. This remained true through the FFY 99 CSBG programs (which terminated 9-30-00). This has been accomplished through some direct provision of services by eligible entities, but mostly through 175 service providers that are subcontractors.

Because Wyoming=s previous eligible entities (other than community action agencies and migrant and seasonal farmworker organization), local governments (county commissions) were no longer automatically eligible entities (because there are no more "waiver states" under the new CSBG Act), there have been many new eligible entities beginning in the FFY 2000 program. All present and future eligible entities will be governed by tripartite governing boards, be they public or private sector (see "Tripartite Board" Section).

Eligible Entities/Preference:

The new CSBG Act now compels the State to seek a qualified private nonprofit organization as the first option for eligible entity designation. Only in circumstances where no such private nonprofit organization may qualify, may the State consider designating a political subdivision or public organization. If a qualified private nonprofit organization exists that is interested and has the capacity to administer the CSBG, a political subdivision may not be designated. The State cannot consider a political subdivision or an organization other than a private nonprofit organization, even if such a subdivision or public organization already served as an eligible entity during FFY 99. Only when the State cannot identify a viable private nonprofit organization may it then designate a political subdivision. Ultimate decisions regarding eligible entity status remain the responsibility of the State.

It was clearly the intent of Congress that "States shall give consideration to using existing, private organizations to provide CSBG services". This, of course, applies only to those private organizations that operate under a tripartite governing board; provide a broad range of services; and who have the capability to fully participate in the development, planning, implementation, and evaluation of the CSBG program.

Congressional intent states "The purposes of the CSBG are...to provide assistance to states and local communities, working through a network of community action agencies and other neighborhood-based organizations for the empowerment of low-income families and individuals in rural and urban areas to become fully self-sufficient, particularly those who are attempting to transition off a state welfare program." Aside from specifically mentioning community action agencies, the term "neighborhood-based organizations" has traditionally referred to private organizations that operate similar to community action agencies. "Neighborhood-based organizations" does not refer to local units of government.

Another affirmation for the Congressional intent of the Act regarding preference lies in one of its goals (or how the Act's purposes will be accomplished); "The broadening of the resource base of programs directed to the elimination of poverty so as to secure a greater role for ...private, religious, charitable, and neighborhood-based organizations; and ...individual citizens, and business, labor, and professional groups who are able to influence the quantity and quality of opportunities and services for the poor."

There is also very strong emphasis for preference for private organizations versus public in the new CSBG Act regarding unserved areas. In summary, this essentially says that, according to the CSBG Act, a state may not consider a political subdivision or an organization other than a private nonprofit organization, even if such a subdivision or public organization already serves as an eligible entity or receives CSBG funds. Only when the State cannot identify a viable private nonprofit organization may it then designate a political subdivision. This refers specifically to unserved geographical areas. As noted earlier, the final arbiter of "eligible entity" status is the CSP, on the basis of application content and with regard given to the wording of the Act and Congressional intent.

Eligible Entities= Designation and Re-Designation in Unserved Areas

If an existing eligible entity has gone out of business, does not choose to become designated (or re-designated, as appropriate), if the State has lawfully terminated the entity's CSBG funding, or if a geographic area is not, or ceases to be, served for any other reason; CSP may designate a new "eligible entity" if previous eligible entities can not, or will not, meet the tripartite governance board requirements, or any requirements in the CSBG Act and the State Plan.

The legislative history of the new CSBG Act emphasizes that it was the intent "that states shall give consideration to using existing, private nonprofit eligible entities to provide CSBG services in unserved areas. Utilizing existing eligible entities will effectively leverage CSBG resources and expertise and ensure continuity in the program@ (Conference Report in October 6, 1998 Congressional Record at H9717).

The new process also favors existing eligible entities by requiring any private nonprofit organization designated as an eligible entity to have demonstrated effectiveness in meeting CSBG=s goals and purposes and a Tripartite Board.

Location will be a factor in selection also. CSP may choose among (1) private nonprofit organizations (including both current eligible entities and other nonprofit organizations, including faith-based) located in unserved or underserved areas and capable of providing a wide range of services designed to eliminate poverty and foster self-sufficiency; and (2) private eligible entities located nearby already providing related services in the unserved or underserved area, but other entities may be selected only if they are located in, rather than just near, the unserved or underserved area. If no private organization is determined to be qualified, the State may designate a local unit of government to serve as the eligible entity if it has a Tripartite Board. The language from the CSBG Act with respect to eligible entities designation and re-designation in unserved areas follows:

- **Qualified Organization In Or Near Area:** If any geographic area of the state is not, or ceases to be, served by an eligible entity under the Act, and if the State decided to serve such an area, the State may solicit applications from, and designate as an eligible entity-
 - private nonprofit organization (which may include an eligible entity) that is geographically located in the unserved area, that is capable of providing a broad range of services designed to eliminate poverty and foster self-sufficiency, and that meets the requirements of the Act; and
 - a private nonprofit eligible entity that is geographically located in an area contiguous to or within reasonable proximity of the unserved area and that is already providing related services in the unserved area.

In order to serve as the eligible entity for the area, the latter type of eligible entity described shall agree to add additional members to the board of the entity to ensure adequate representation--

- in each of the three required categories described in subparagraphs (A), (B), and (C) of section 676B(a)(2) (Tripartite Boards composition; 1/3 elected public officials or their representatives; 1/3 members who are chosen in accordance with democratic selection

procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and the remainder are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served. These members must reside in the community comprised by the unserved area; and

- in the category of low-income representatives, the members must reside in the neighborhood to be served.
- No Qualified Organization in Or Near Area: If no private nonprofit organization is identified or determined to be qualified in the "Qualified Organization in Or Near Area," category, to serve the unserved area as an eligible entity the State may designate an appropriate political subdivision of the state to serve as an eligible entity for the area. In order to serve as the eligible entity for that area, the political subdivision (local government) shall have a Tripartite Board or other mechanism as required in section 676B(2) of the Act (Tripartite Boards).
- Special Consideration: In designating an eligible entity under the "Designation and Redesignation of Eligible Entities in Unserved Areas," the State shall grant the designation to an organization of demonstrated effectiveness in meeting the goals and purposes of the CSBG Act and may give priority in granting the designation, to eligible entities that are providing related services in the unserved area, consistent with the need identified by a community-needs assessment.

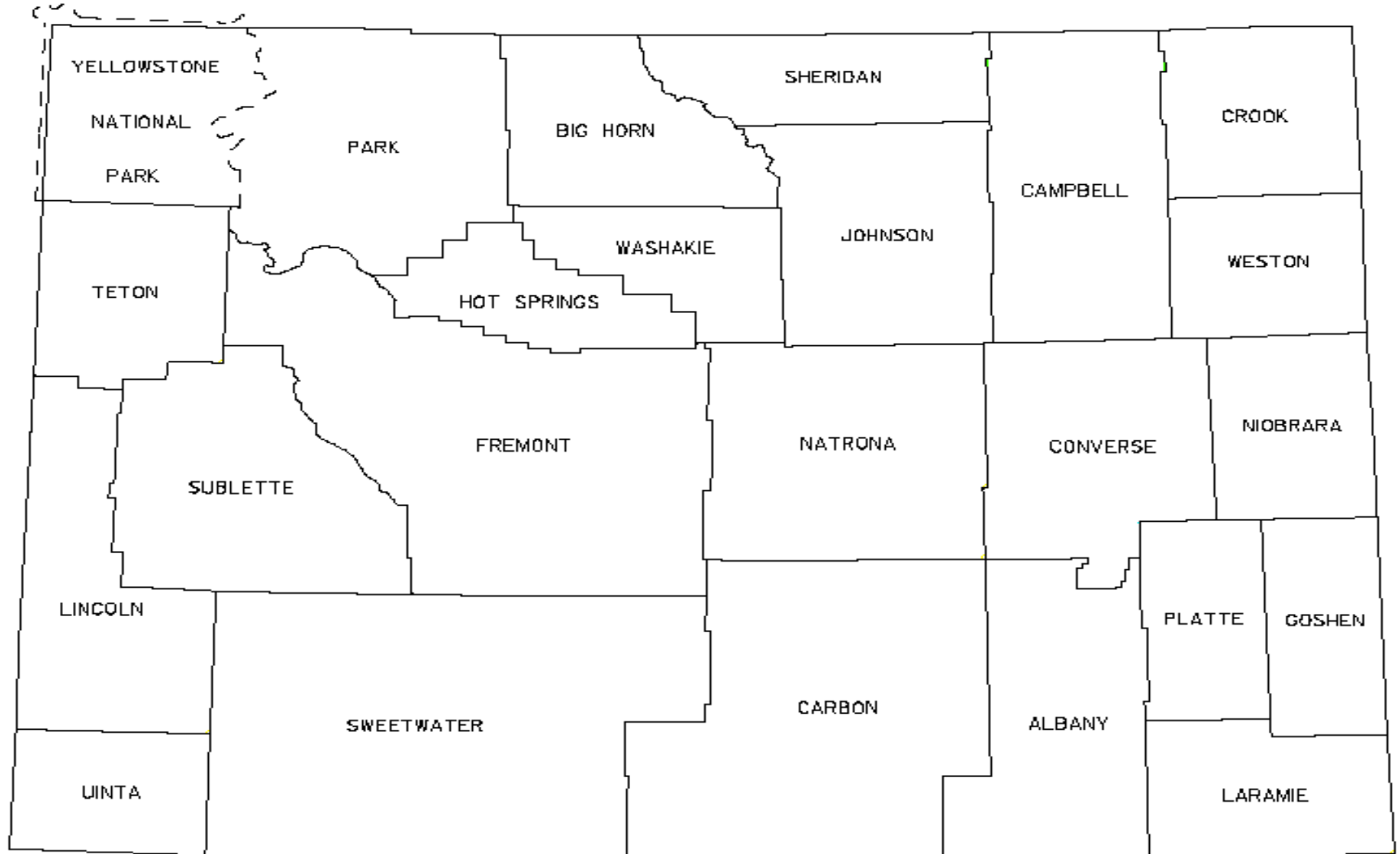
As of this writing, the following have been designated as eligible entities in the State of Wyoming:

<u>Eligible Entity</u>	<u>Status</u>	<u>Geographic Area(s) Served</u>
CSBG Board of Directors of Albany County	Public	Albany County
Campbell County CARE Board	Public	Campbell County
Carbon County Community Action Committee	Public	Carbon County
Converse County Human Resources Council	Private	Converse County
Crook County Council of County Services	Private	Crook County
Fremont County Action Committee	Private	Fremont County
Northwest Community Action Programs of Wyoming, Inc.*	Private	Goshen, Hot Springs, Lincoln, Niobrara, & Sublette Counties
Community Resource Center of Johnson County*	Private	Johnson County
Community Action of Laramie County, Inc.*	Private	Laramie County
Community Action Partnership of Natrona County*	Public	Natrona County
Yellowstone Country Assistance Network*	Public	Park County
Platte County Tripartite Board	Public	Platte County
Sheridan County Tripartite Board	Public	Sheridan County
Sweetwater County Tripartite Board	Public	Sweetwater County
Teton County Tripartite Board	Private	Teton County
Human Services Board of Uinta County	Public	Uinta County
Washakie and Big Horn Counties Tripartite Board	Public	Washakie/Big Horn Counties
Weston County Action Committee	Private	Weston County
(Northern) Arapaho Human Services Commission	Public	Wind River Reservation

(* Community Action Agency)

In addition to the eligible entities listed above, the Wyoming CSBG system will utilize approximately 175 service providers/subcontractors; a diverse mix of public and private sector organizations.

Geographic Areas Served:



State-Wide Coverage:

The intent of CSP is to again have state-wide coverage of CSBG activities and services, as has been the case in the past. The basic philosophy of CSP is that even one unserved or underserved area is one too many. Every possible effort will be made by CSP and its local networks to continue such state-wide coverage.

The designation and/or re-designation in unserved or underserved areas will be accomplished in total compliance with the requirements in the new CSBG Act with regard to designation and re-designation in unserved or underserved areas (See "Eligible Entities' Designation and Re-designation in unserved and Underserved Areas" Section in this Plan).

Wind River Reservation:

The State, beginning in FFY 82, began a strong commitment to helping the tragic conditions at the Wind River Reservation, which is primarily inhabited by the Northern Arapaho and the Shoshone Indian Tribes. Since then, the State has provided CSBG funds to the Tribal governments through a formal application process.

In August of 1988, a human services needs assessment was completed at the Wind River Reservation for the purpose of assessing the human resources and needs, to determine the true level of services, and to make recommendations, if necessary, to improve the level and quality of services. The components were (1) a general population survey, consisting of personal interviews with heads of households, and (2) a key persons agency survey, consisting of interviews with key personnel of public and private organizations both on and off the Reservation.

The "WINDS" Project (Wind River Indian Needs Determination Survey) was funded in part by CSBG funds, along with funding from the Tribes, and from the BIA (Bureau of Indian Affairs). The lead agency for the project was the State Community Services Programs.

A total of 1,599 personal contacts were made, resulting in 1,532 completed questionnaires (a truly phenomenal response rate of 96%). The 12-page questionnaire emphasized demographic/income information, basic needs, employment, housing, transportation, education, recreation, and health data, as well as related categories. A formal report was widely distributed nationally and state-wide shortly after compilation and analysis of the data. The full report contains an incredible amount of information designed to bring to light the tragic conditions, and ultimately, to better assist people in need at Wind River through better awareness and, hopefully, more funding from all levels.

The results of the comprehensive needs assessment clearly show that the Wind River Reservation represents an area that is chronically economically depressed. It is characterized by an astoundingly high rate of unemployment, and unusually high needs for services in the areas of health, alcohol and drug abuse, education, quality of housing, economic development, sanitation, and related areas.

The general quality of CSBG programs operated by the Tribes is currently very high, but the degree of need, and the current limited resources call for much more commitment from local providers, both public and private, the state, and the Federal Government. (Is anyone out there listening?).

Distribution and Allocation of Funds:

Not less than ninety percent (90%) of Wyoming's CSBG funds will be available to eligible entities for the provision of local CSBG activities and services. Five percent (5%) is allocated for state level administration. Five percent (5%) is allocated for state-wide training and technical assistance activities. Any unexpended funds from that five percent component may be reallocated to eligible entities.

State level Administration Funding:

No more than five percent (5%) of the State's CSBG funds will be used for state level administration.

Federal Discretionary Funding:

Five percent (5%) of the State's CSBG funds will be used to provide Training and Technical Assistance to eligible entities and service providers.

State Set-Aside Funding:

Ten percent (10%) of the State's CSBG funds will be used to fund specific projects at the discretion of CSP. This amount is set aside at the onset of each new program year, with Requests for Proposals (RFPs) being distributed to prospective grantees (eligible entities only) around three (3) months after the new program year has begun. As opposed to the regular CSBG funds component whereby eligible entities are allocated funds based upon the CSBG Poverty Rating by geographical areas, the discretionary funds are fully competitive with all interested eligible entities.

These funds add significantly to the flexibility of the CSBG to react to state-wide low-income problems and subsequent resolution of problems. Priorities for these funds vary from year to year, depending upon local conditions and related issues. However, priorities for funding generally will include the following:

- (a) Unanticipated and/or unmet needs;
- (b) Welfare reform coordination;
- (c) Priorities established in the Community Action Plans which have not been adequately funded and/or addressed;
- (d) Emergency/disaster/crisis situations;
- (e) Improvement of the coordination, networking, and working relationships with the CSBG and other related organizations and programs, both in the public and the private sectors;
- (f) Research and information capabilities dealing with poverty issues;
- (g) Improvement of local infrastructures to better resolve problems associated with poverty and related conditions;

- (h) Advocating for, planning, coordinating, and assessing needs and problems of low-income people on a state-wide level and, through education of the general public about poverty issues;
- (i) Mobilization of resources to better resolve problems associated with poverty;
- (j) Forums to encourage low-income people to participate more in governmental processes and poverty-related issues;
- (k) Encouragement of the private sector in the coordination process, the forum and problem solving process, and in resource mobilization;
- (l) Provision of training and technical assistance for local CSBG and related community based organizations; and
- (m) Other priorities established that show strong potential for better resolution of poverty-associated issues.

Ten percent (10%) is held back as “state set-aside funding” at the start of each program year and made available through the Request for Proposal (RFP) process at a later time for discretionary projects, on a competitive basis. These funds are part of the 90% category of CSBG funds. The intent is to use these funds to resolve problems that may arise from unanticipated or newly-established needs, emergency situations, innovative solutions to identified problems, welfare reform and other coordination, priorities identified in the original local community action plans but not funded due to funding constraints, the improvement and/or the establishment of coordination and linkages between public and private sectors, and other projects intended to further the effectiveness of the CSBG and related networks in the state.

Wind River Reservation Funding:

Ten percent (10%) is set aside for Wind River Reservation programs. This set-aside is necessary inasmuch as using the standard funding formula would also do a disservice to the Indian population. Because of the (relatively) small number of Indian people, compared to the overall state population, if the funding distribution formula were used for their allocation (as with counties) the tribes would receive such small amounts that the CSBG would not be of much benefit to the Indian population. Further information about the specific needs of the Indian populations in Wyoming is found in the AWind River@ section under the AGeographic Areas to Be Served@ section, which was derived from two very comprehensive needs assessments. There is absolutely no question that the needs of the Indian population in Wyoming is tenfold (or more) of not only the general population, but of the low-income population.

Use of Funds:

In General:

Not less than 90% of the funds made available to the State under section 675A or 675B will be used to make grants for the purposes described in section 672 of the CSBG Act to eligible entities.

Obligational Authority:

Funds distributed from the State to eligible entities for FFY 2010 shall be available for obligation during FFY 2010.

A general FFY 2010 BUDGET with brief budget narratives follows:

State level Administration **\$ 186,500.00**

(Funds used at the state level for Administration; CSP, RFHD, WDH)

Federal Discretionary **\$ 177,175.00**

(Including, but not limited to training and technical assistance to eligible entities and subcontractors; coordination of human resources programs both at the state and the local level; analyzation of the distribution of State CSBG funds to determine if funds have gone to areas with the greatest need; supporting innovative programs conducted by eligible entities and other community organizations to eliminate poverty and to promote self-sufficiency and community revitalization; and other activities consistent with CSBG purposes)

Status: Funds will be used for both Public and Private Sector eligible entities percentage of each is unknown at this time.

State Set-Aside Funding **\$ 336,633.00**

(Funds reserved under the 90% Eligible Entity Category, set aside at the start of the program year and made available later through the Request For Proposal(RFP) process for resolution of unanticipated needs, unserved and/or under-served areas, emergency situations, innovative programs, and others consistent with CSBG purposes)

Status: Funds will be requested through Tripartite Boards for sub-contracting agencies in the Public and Private Sector; percentage of each is unknown at this time.

Wind River Reservation **\$ 302,969.00**

(Tribal Governments set-aside because of the unusually high degree of need for CSBG services; part of the 90% Eligible Entity Category)

Status: Private Eligible Entity

CSBG Formula Funding **\$2,726,723.00**

(Other than Tribal and Migrant and Seasonal Farmworker Organizations and Set-Aside Component, requested by Tripartite Boards designated as CSBG eligible entities)

Total: **\$3,730,000.00**

The following page reflects the most recent data available used to establish the County Poverty Factors, which essentially translate into fund allocations for the respective jurisdictional areas (i.e., counties).

Planned Distribution of Funds for FFY 2010

Geographic Area	Low-Income Pop.	% of WY	People Out of Work	% of WY	People Using Food Stamps	% of WY	People on Title XIX	% of WY	People on Power* TANF*	% of WY	Apps rcvd for Asst.	% of WY	Peopl e on S.S.I.	% of WY	Poverty Rating	% of CSBG Funds	Allocation in Dollars
Albany	4,839	10.1	754	4.4	634	6.1	1,798	4.9	9	2.9	272	6.0	234	4.0	5.5	5.48	149,374
Big Horn	1,090	2.3	399	2.3	110	1.1	723	2.0	4	1.3	62	1.4	163	2.8	1.9	1.86	50,832
Campbell	2,387	5.0	1,378	8.1	420	4.1	2,059	5.6	6	1.9	293	6.5	235	4.0	5.0	5.01	136,650
Carbon	1,484	3.1	531	3.1	390	3.8	1,220	3.3	8	2.6	157	3.5	144	2.4	3.1	3.11	84,774
Converse	1,202	2.5	380	2.2	254	2.5	922	2.5	11	3.6	105	2.3	126	2.1	2.5	2.53	68,900
Crook	463	1.0	180	1.1	53	0.5	294	0.8	0	0.0	26	0.6	34	0.6	0.6	0.64	17,441
Fremont	4,662	9.7	1,394	8.2	1,065	10.3	3,734	10.1	27	8.7	400	8.8	828	14.0	10.0	9.98	272,029
Goshen	1,717	3.6	311	1.8	472	4.6	1,182	3.2	10	3.2	150	3.3	211	3.6	3.3	3.32	90,622
Hot Sprgs.	485	1.0	149	0.9	120	1.2	445	1.2	3	1.0	53	1.2	88	1.5	1.1	1.13	30,676
Johnson	643	1.3	289	1.7	99	1.0	445	1.2	2	0.6	49	1.1	42	0.7	1.1	1.09	29,744
Laramie	6,805	14.1	2,445	14.4	2,282	22.0	6,756	18.3	115	37.2	881	19.5	1,212	20.5	20.9	20.86	568,658
Lincoln	1,271	2.6	578	3.4	179	1.7	806	2.2	2	0.6	77	1.7	113	1.9	2.0	2.03	55,348
Natrona	6,970	14.5	2,464	14.5	1,592	15.4	5,894	16.0	53	17.2	755	16.7	1,037	17.5	15.9	15.95	434,896
Niobrara	273	0.6	60	0.4	77	0.7	239	0.6	1	0.3	22	0.5	31	0.5	0.5	0.52	14,192
Park	3,009	6.2	780	4.6	531	5.1	1,881	5.1	22	7.1	219	4.8	262	4.4	5.3	5.35	145,840
Platte	991	2.1	212	1.2	184	1.8	705	1.9	4	1.3	64	1.4	101	1.7	1.6	1.63	44,424
Sheridan	2,353	4.9	953	5.6	562	5.4	1,820	4.9	12	3.9	239	5.3	268	4.5	4.9	4.93	134,532
Sublette	414	0.9	318	1.9	28	0.3	289	0.8	1	0.3	23	0.5	22	0.4	0.7	0.71	19,430
Sweetwater	2,835	5.9	1,521	9.0	454	4.4	2,667	7.2	7	2.3	307	6.8	322	5.4	5.8	5.85	159,433
Teton	965	2.0	721	4.2	61	0.6	482	1.3	2	0.6	33	0.7	48	0.8	1.5	1.48	40,238
Uinta	1,935	4.0	725	4.3	480	4.6	1,465	4.0	3	1.0	214	4.7	243	4.1	3.8	3.81	103,955
Washakie	776	1.6	248	1.5	195	1.9	641	1.7	4	1.3	75	1.7	86	1.5	1.6	1.58	43,208
Weston	578	1.2	193	1.1	125	1.2	482	1.3	3	1.0	51	1.1	68	1.1	1.2	1.16	31,527
TOTALS	48,147	100	16,983	100	10,367	100	36,949	100	309	100	4,527	100	5,918	100	100	100	2,726,723
Statistic Source	U.S Census & Retrieval Service		Wyoming Dept of Employment		Wyoming Dept of Family Services		Wyoming Dept of Family Services		Wyoming Dept of Family Services		Wyoming Dept of Family Svcs		U.S. Social Security Admin.		* Personal Opportunities with Employment Responsibilities (State)		
TIME PERIOD	As Of 12/2008		As Of 6/2009		As Of 07/2009		As Of 07/2009		As Of 07/2009		As Of 07/2009		As Of 12/2008		* Temporary Assistance for Needy Families (Federal)		

DESCRIPTION OF CRITERIA AND DISTRIBUTION FORMULA

The distribution formula was originally developed by the CSP in 1983, and has been revised, as appropriate through the years, with approval from the State Legislature. The formula does not use Ageneral population@ figures for each local jurisdiction because it was felt that those figures would not necessarily reflect the true needs of the low-income population. Philosophically, funding by the Ageneral population@ assumes that the degrees and frequencies of needs, as well as the general characteristics of the low-income population, is the same in all geographical areas; which is a bad assumption. As a consequence, CSP= funding distribution formula relates only to low-income data and information. The formula embodies the concept of equity throughout the state based on the perceived need in each jurisdiction (i.e., its twenty-three (23) counties and the Wind River Reservation).

As is shown in the Table, the most recent low-income data available is used from a number of sources, (1) U.S. Census and Retrieval Service (low-income census counts); (2) Wyoming Department of Employment (unemployed people);(3) Wyoming Department of Family Services (people on Food Stamps/ people on Title XIX (Medicaid)/People on APersonal Opportunities With Employment Responsibilities@(POWER), which is Wyoming=s version of the federal ATemporary Assistance for Needy Families@(TANF)/applications received for financial and social assistance) and (4) U.S. Social Security Administration (people on Social Security Insurance).

The base of the current formula is:

1. the number of low-income people (as defined by the 100% Poverty Guidelines) within each geographic jurisdiction (counties), or simply, the percent (by county) of the total state low-income population;
2. the number of unemployed people in each county, and percent of the state=s unemployed;
3. the number of people receiving Food Stamps in each county, and percent of the state=s Food Stamp total;
4. the number of people on Title XIX (Medicaid) in each county, and the percent of the state=s total;
5. the number of people on APersonal Opportunities With Employment Responsibilities@ (POWER), which is Wyoming=s version of the federal ATemporary Assistance for Needy Families@ (TANF) in each county, and the percent of the state=s total;
6. the number of applications received for financial and/or social services assistance by the Department of Family Services in each county, and the percent of the state=s total; and
7. the number of people receiving Social Security Insurance (all categories) in each county, and the percent of the state=s total.

These seven factors, or variables, are then averaged into a ACounty Poverty Factor@, which translates to each county=s percent of the funds available in that county for CSBG activities and services.

Funding Limitations:

Construction: As in the past, CSBG funds may not be used, without a waiver from HHS/OCS, for the purchase or improvement of land, or the construction, or permanent improvement of any building or facility. Funds may be used for low-cost weatherization, home rehabilitation, or other energy-related home repairs only for the low-income population.

Political Activity: The new version of the CSBG Act retains the prior prohibition on CSBG-funded programs supporting or being identified with voter registration activity or transportation to the polls or other similar assistance to voters or prospective voters. The new Act also added new political restrictions, including a prohibition on support by CSBG-funded programs of, or identification of CSBG-funded programs with, any political activity connected with an election for public or political party office. (Entities receiving CSBG funds which are tax exempt 501(c)(3) organizations are already prohibited from all activity connected with a political campaign).

In addition, the new Act reinstated the Hatch Act restrictions on political activity of employees (even if CSBG funds are not used), found at 5 U.S.C. ' ' 1501 - 1508. Those restrictions had been removed from the CSBG Act in 1994. Employees of any entity which receives CSBG funds may not: (1) use their official authority or influence to interfere with or affect the result of an election or a nomination for office; or (2) coerce, command, or advise a state or local officer or employee, or another employee of a CSBG-funded entity, to pay, lend, or contribute anything of value to any person or entity (including a political party) for political purposes. Also, employees of any entity which receives CSBG funds, and plans, develops, and coordinates CSBG activities (CSBG coordination entities), which presumably means most community action agencies, and similar-type groups, may not be a candidate for partisan elective office (i.e., as a representative of a political party). Such restrictions do not bar employees from voting as they choose or expressing their opinions on political subjects or candidate, as long as those opinions are not identified with CSBG-funded programs. The HHS/OCS will issue specific regulations to enforce the new rules on political activity.

The State of Wyoming intends to fully comply with the prohibition with regard to political activities, both on a state level, and on the local-level, through its eligible entities and subcontractors.

DESCRIPTION OF DISTRIBUTION AND USE OF RESTRICTED FUNDS

The State may recapture and redistribute funds distributed to an eligible entity that are unobligated at the end of the Federal Fiscal Year (FFY) if such unobligated funds exceed 20% of the amount so distributed to such eligible entity for the FFY.

In redistributing the funds captured, the State will redistribute such funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the CSBG.

DESCRIPTION OF DISTRIBUTION AND USE OF DISCRETIONARY FUNDS

Five percent (5%) of the State=s CSBG funds are set aside for activities state-wide that are distinct from the other 90% of its funds allocated to local CSBG eligible entities (grantees) and subcontractors. Whatever is not going to be expended in this category will be reallocated to eligible entities involved in the A90%@ category.

Preliminary planning and analysis based primarily on the requirements of the new CSBG Act indicate that such state-wide activities may include (but are not limited to):

- a. Training and technical assistance to local eligible entities and related organizations; particularly in the areas of establishment and operation of tripartite governance boards, Management Information Systems (MIS) Results Oriented Management and Accountability (ROMA) systems, Community Action Plans, Needs Assessments; and related administrative and program areas;
- b. Coordinating state-operated programs and, at the option of the state, local programs, serving low-income children and families with services provided by eligible entities and subcontractors;
- c. Supporting state-wide coordination among eligible entities and subcontractors;
- d. Supporting individual development account and other asset-building programs;
- e. Analyzing distribution of State CSBG funds to determine if funds have gone to areas with the greatest need;
- f. Supporting establishment of State Charity Tax Credit Program;
- g. Joint projects with the Wyoming Department of Family Services to assist those people in transition from welfare to self-sufficiency, and with other involvement from other appropriate federal, state, local, and private organizations; and
- h. Supporting other activities consistent with the purposes of the CSBG.

DESCRIPTION OF USE OF ADMINISTRATIVE FUNDS

Five percent (5%) has been allocated for administration for state level purposes. The State will not expend more than 5% for administration. This category is monitored closely, not only by CSP, but by the Budget and Fiscal Office of the Wyoming Department of Health and the State Auditor's Office.

Administrative Costs:

The United States Health and Human Services, Office of Community Services (HHS/OCS) defines "direct" program and "administrative" costs in accordance with three criteria: (a) meeting Congressional intent for the program; (b) achieving consistency with HHS audit and financial management standards; and (c) ensuring a common basis for relating expenditures to the Community Services Block Grant (CSBG) Results Oriented Management and Accountability (ROMA) System (or, in Wyoming's case, *Wyoma*).

"Direct" program costs can be specifically identified with delivery of a particular project, service, or activity undertaken by a grantee to achieve an outcome intended. For CSBG, such direct costs derive from the funding objectives specified in the system required. Direct program costs are incurred for the service delivery and management components within a particular program or project. Therefore, direct program costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts that expressly relate to the delivery of an individual program or service funded by the Wyoming Community Services Programs (CSP). The CSP will not fund part salaries simply to supplement or supplant salaries funded by other funding sources.

"Administrative" costs, in the context of the CSBG statutory reporting requirements, are equivalent to the familiar concepts of "indirect" costs or "overhead." As distinguished from program administration or management expenditures that qualify as direct program costs, administrative costs refer to central executive functions that do not directly support a specific project or service. Rather, administrative costs are incurred for common objectives that benefit multiple programs administered by the grantee organization, or the organization as a whole, and as such are not readily assignable to a particular program funding stream. Administrative costs relate to the general management of the grantee organization, such as strategic direction, Board development, Executive Director functions, accounting, budgeting, personnel, procurement, and legal services.

Under the CSBG reauthorization and national ROMA goals, eligible programmatic activities explicitly include efforts to coordinate and strengthen a range of local programs and services that combat poverty. These efforts often entail planning and management functions that facilitate integrated approaches among more categorical public, private, and non-profit entities within a community. They also provide additional resources to enhance or supplement (but not supplant) the activities of programs that receive other federal, state, local and private funding. HHS/OCS considers such functions to constitute a core CSBG program purpose, significant and necessary to the grantee mission, pursuant to Congressional intent. Use of CSBG funds to augment and coordinate other programs is an allowable cost. Supplanting funds (using funds to replace other funds with CSBG funds) is not allowable. Furthermore, although some of these functions have administrative qualities, related expenditures that can be specifically identified with a programmatic activity to coordinate and strengthen other programs and services should be categorized as direct program costs, because they achieve an outcome intended by the Congress in the express language of the CSBG reauthorizing statute.

New reporting requirements in the CSBG reauthorization, and potential confusion with terminology used in OMB Circular A-122 and the cost accounting field, necessitate some clarification for grantees and auditors regarding (1) the definition of different cost categories in the CSBG Program and (2) the character and allowability of CSBG expenditures to coordinate and link multiple anti-poverty programs.

The CSBG reauthorization requires that HHS report to Congress on the use of CSBG funds by grantees, including a breakdown of expenditure by "direct" and "administrative" functions. The CSBG statute also requires that HHS define "direct" and "administrative" costs for those purposes.

In addition, OMB Circular A-122, Cost Principles for Non-Profit Organizations uses similar terms, with different meanings in providing guidance on setting indirect cost rates and charging expenditures to grants, per OMB Circular A-122 or how grantees define costs for the purposes of establishing indirect cost rates for the CSBG program. The CSP will determine and establish indirect cost rates for grantees and sub-grantees.

CSBG funds may be used to undertake a very broad range of activities, including linking and strengthening other anti-poverty programs and services. For example, CSBG funds may support planning, coordination, and capacity-building to improve the effectiveness of other community programs and organizations. CSBG funds may also be used to enhance and supplement other federally funded programs, but not to supplant any other funds from any sources. The relatively unusual flexibility to fund coordination and enhancement programs, which sometimes have managerial and administrative qualities, may generate questions regarding the character of those expenditures under the costing definitions. Therefore, CSP, based

on direction from HHS, is providing guidance regarding what constitutes a direct or administrative cost in those circumstances. Furthermore, CSP is reaffirming that such expenditures are allowable costs under the CSBG statute, so long as they are determined by CSP to be "reasonable" and prudent.

The preceding language has primarily been directed toward OMB Circular A-122. OMB Circulars A-128 and A-133 also apply. OMB Circular A-122 is the latest revision and refers to audits of states, local governments, and non-profit organizations.

Specific audit requirements for all CSBG contractors and subcontractors are found in the "Audit Requirements" Section of this Plan.

The following represents definitions of CSBG direct program costs and administrative costs.

The CSBG reauthorization requires that the CSP will provide a programmatic report to the HHS/OCS that includes the use of CSBG funds by grantees by expenditure on "direct" and "administrative" functions. The HHS/OCS will, in turn, provide the report to Congress as mandated by the CSBG Act. For the purpose of this programmatic report, CSP offers guidance on defining these terms to help ensure consistency among CSBG grantees and subgrantees in assigning costs to these categories.

“Direct” Program Costs for CSBG Reporting. Direct program costs can be identified with delivery of a particular project, service, or activity intended to achieve an objective of the grant award. For the CSBG, those purposes and eligible activities are specified in the reauthorizing statute, reflected in the national ROMA performance measures, and further specified in the Wyoming State CSBG Plan. Direct program costs are incurred for the service delivery and management components within a particular program or project. Therefore, direct costs include expenditures on some activities with administrative qualities, including salaries and benefits of program staff and managers, equipment, training, conferences, travel, and contracts, as long as those expenses relate specifically to a particular program or activity, but not to the general administration of the organization.

“Administrative” Costs for CSBG Reporting. In the context of CSBG statutory reporting requirements, administrative costs are equivalent to typical indirect costs or overhead. As distinguished from program administration or management expenditures that qualify as direct costs, administrative costs refer to central executive functions that do not directly support a specific project or service. Administrative costs incurred for common objectives that benefit multiple programs administered by the grantee organization (or the organization as a whole) are not readily assignable to a particular program funding stream. Rather, administrative costs relate to the general management of the grantee organization, such as strategic direction, Board development, Executive Director functions, accounting, budgeting, personnel, procurement, and legal services.

OMB Circulars A-122, A-128, and A-133 establish general principles for determining the costs of federal grants for non-profit organizations and public organizations. In contrast, the new CSBG reporting requirement focuses on developing a better understanding of the specific relationship between CSBG funding and program operations, particularly in the context of ROMA objectives (or, in Wyoming's case, *Wyoma*).

The circulars provide grantees with guidance on accumulating direct and indirect costs in order to ascertain the total or "full costs" of a grant program. Circular requirements ensure that a grantee is internally consistent in the manner it charges costs to federal grant sources, so that costs are charged to a grant through

an approved indirect cost rate. Furthermore, indirect costs may be classified within the subcategories of "administrative" costs and "facilities" costs. The circulars permit grantees substantial latitude in defining and grouping these costs, dependent on an organization=s structure, number of programs operated, funding sources, and accounting systems.

Therefore, "administrative" costs as defined under the OMB Circulars are not necessarily interchangeable with "administrative" costs for CSBG program reports. If the circulars' definitions were used for CSBG programmatic reporting requirements, the latitude provided in the circulars could result in "direct" and "administrative costs" being overstated or understated for purposes of CSBG program reports. For example, the circulars permit grantees to include all facility costs, including maintenance and operations, as a separately identified category in calculating their indirect costs rates. However, for CSBG program reports, facility costs attributable to the operation of direct program activities should be reported as "direct" costs, and facilities costs associated with general management of the organization should be reported as "administrative" costs. The same principle for assigning a direct cost in CSBG program reports applies to any other costs included in an organization=s approved indirect cost rate that can be identified with delivery of a particular activity to achieve an objective of the CSBG award.

Thus, in CSBG program reports, grantees might deviate from the definition of "administrative" costs used in developing an indirect cost rate under the OMB Circulars. Again, such a recasting for purposes of a CSBG program report does not in any way modify the requirements of the circulars or the classification of costs in a grantee=s approved indirect cost rate. Claims for actual expenditures on federal grant programs must remain consistent with the classification of costs used in the approved indirect cost rate.

- *Optional Supplemental Cost Information.* In reporting on the distribution of CSBG expenditures between direct and administrative costs, CSBG recipients might also wish to include information on the distribution of overall agency spending between direct and administrative costs. Such information on the relative proportion of overall agency expenditures could provide a more accurate picture of agency operations and help to interpret the role of CSBG funds in supporting agency programs.
- *Allowability of CSBG Expenditures on Coordination and Strengthening Activities.* The purpose of the CSBG award differs from most other grants because it does not focus on funding a particular service; CSBG does not function solely as a "stand alone" program. Rather, CSBG funding can support (1) creation of new programs and services, (2) augmentation of existing programs and services (or "supplementing," but not "supplanting"), and (3) organizational infrastructure required to coordinate and enhance the multiple programs and resources that address poverty conditions in the community.

The requirements for allowable costs are unique to each federal program and are found in the laws, regulations, and provisions of grant agreements pertaining to the program (OMB Circular A-133 Compliance Supp. 3(A),1997). In addition, allowable costs should comply with several general criteria: (1) reasonable and necessary for performance and administration of the award; (2) conforming to limitations or exclusions set in the award or OMB Circular A-122 Attachment B; (3) consistent with the uniform policies and procedures of the organization; (4) allocated consistently as direct or indirect in like circumstances; (5) in accordance with generally accepted accounting principles; (6) not used to match the cost-sharing or matching requirements of another federally-funded program, or charged as a cost to such a program; and (7) documented adequately (OMB Circular A-122, Attachment A(2)).

Within this framework, use of CSBG funds to both coordinate and expand local services and programs related to the elimination of poverty meet the standards for allowable costs. These activities comprise the largest spending category for the CSBG award. They often entail planning and management functions that facilitate shared resources and integrated approaches among multiple categorical services and programs within a community. They also leverage, enhance, and supplement the impact of programs supported by other federal, state, local, and private funding sources.

The CSBG reauthorizing statute specifically targets "the strengthening of community capabilities for planning and coordinating the use of a broad range of federal, state, local, and other assistance (including private resources) related to the elimination of poverty, so that this assistance can be used in a manner responsive to local needs and conditions." The statute requires grantees to develop linkages that fill identified gaps in services and support innovative community and neighborhood-based initiatives. The statute also requires that grantees "coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services..."

The statutory mandate for coordination is reinforced by the goals and outcome measures established in the ROMA performance-based management system, made compulsory by the CSBG reauthorization (in Wyoming's case, *WyoROMA*). Two of the six national ROMA goals are "developing partnerships among supporters and providers of services to low-income people" and "increasing the capacity of local agencies to achieve results."

These coordinating and strengthening programs may include, but are not limited to: multi-agency strategic planning; community-wide needs assessments; co-location of complementary services; computerization of common intake and referral systems; formalized networking to share resources and facilities; and organization of cross-sector coalitions to address specific community concerns.

The CSBG authorizing statute also explicitly permits the use of CSBG funds to augment (or supplement) existing community-based programs. The legislation calls for "the broadening of the resource base of programs directed to the elimination of poverty...." It also provides funds to "make more effective use of...other programs related to the purposes" of the CSBG legislation. For example, CSBG funds can be applied to "support development and expansion of innovative community-based youth programs...."

CSBG funds do remain subject to the standard grant policy prohibition against "cost-shifting" (also known as "supplanting"). This policy prohibits using funds from one grant award to pay for program costs instead of (or replacing with) the funds already provided for those same costs from another funding source. However, the policy does not prevent using funds from one grant award to pay for program costs in excess of the amounts provided for those costs in the other current-year award. Specifically, CSBG funds may not be used in place of the amounts provided by another grant award for (1) direct or administrative expenditures that were included as line items in that other grant award, or (2) costs that were included in developing the indirect cost rate. However, CSBG funds may be used to pay for costs of such program activities above and beyond the levels financed by another grant award.

Therefore, consistent with Congressional intent and HHS grants policy, CSBG funds may supplement other grant awards by paying for expansion and enhancement of existing services and programs that already receive federal, state, local, or private funding for those activities. Outcomes of these CSBG

expenditures should be accounted for in the ROMA (or in Wyoming's case, *WyoROMA*) performance-based management system.

- **Cost Allocation for CSBG Coordination and Strengthening Activities.** Because funding the coordination and enhancement of multiple community-based programs is an explicit objective of the CSBG statute, grantee expenditures on projects, services, or activities in these areas constitute appropriate objects for the purposes of assigning direct costs, as well as administrative costs.

Such grantee programs to "coordinate and strengthen" may entail planning and management functions with some characteristics that resemble typical administrative costs, but should be treated as direct costs. For example, CSBG funds can be used to create and maintain a computer network among multiple service providers in a community. CSBG funds can be applied to develop and operate a one-stop family center that houses multiple service providers and programs funded by other sources. CSBG funds can pay for community-wide needs assessments and multi-service strategic planning. CSBG funds also can finance compilation, publication, and distribution of information to help clients make better use of services and programs funded by other sources. The objective of these CSBG-funded coordination programs is to connect and make more effective use of the underlying services and programs, pursuant to the CSBG statutory mandate. Therefore, these activities constitute a core CSBG program purpose, significant and necessary to the grantee mission, and an outcome intended by the funding program to which direct costs should be assigned.

STATE COMMUNITY SERVICES PROGRAM IMPLEMENTATION

Program Overview:

This Plan delineates the manner in which funds will be expended, how the program will be administered, how all of the federal assurances, certifications, and other requirements will be carried out, and other appropriate and pertinent information.

The second part of the Plan is the CSBG Operations Manual, which presents highly detailed information relative to the CSBG and its processes and systems, technical assistance materials for grantees and prospective grantees, pertinent forms and documents, and other appropriate information.

The Wyoming Community Services Programs (CSP) will make this State Plan available for public inspection within the state in such a manner as will facilitate review of, and comment on, the Plan. Copies will be distributed to appropriate people and organizations, i.e., previous eligible entities, subcontractors, State Libraries, and other interested parties for review and comment. Both verbal and written comments on the proposed State Plan will be accepted and considered. Comments from public and/or legislative hearings will be seriously considered before finalization of the State Plan. Newspaper ads will be prepared that encourage solicitation and comment on the Plan.

The CSBG Act, since its inception in 1982, has provided for the shift of primary responsibility of community low-income human services programs from the federal to the state level. The original Act (P.L. 97-35) replaced antipoverty programs previously authorized under the Economic Opportunity Act by the U.S. Community Services Administration, and assigned funds for the programs to the HHS, OCS, to make

grants available through the block grant concept to states for their use in eliminating poverty and related conditions.

Public Law 97-35 has been subsequently amended many times through the years since it was originally passed into law in 1981, with changes being relatively minor in nature. The revised CSBG Act, which became effective on October 27, 1998 preserves the fundamental goals and structure of the program, in particular the essential role of community action agencies. Some significant changes have been made, however, both in substance and in the organization of the statute.

All changes, be they minor or major in nature, have been addressed in the State Plans since FFY 2001 Plan. A brief highlight of the changes follows:

- New expanded statement of purpose;
- Additional requirements and responsibilities for eligible entities= Boards of Directors;
- Increased focus on monitoring, training, and technical assistance, especially before termination or reduction of funding of a local agency;
- New uses permitted for states= discretionary funds;
- New requirement for timely submission of state plan, which may cover one or two years, 30 days before the beginning of the fiscal year;
- Increased reporting by states to HHS, particularly in the areas of client characteristics and more detail with financial expenditures, i.e., administrative costs;
- New requirement for participation in Results Oriented Management and Accountability (AROMA@) or other performance measurement system approved by HHS;
- New process for designating eligible entities in unserved areas. Requires designation of an organization of demonstrated effectiveness in meeting CSBG goals, and permits (but does not require) states to give preference to existing eligible entities;
- In designating eligible entities for unserved areas, states may now consider religious organizations on same basis as other private nonprofit organizations, but the religious organization must meet Tripartite Board and other requirements and many not use CSBG funds for religious purposes;
- Reinstatement of restrictions on political activity;
- Allowance of drug testing of program participants.

Eligible Population:

The State, its grantees (eligible entities), and subcontractors will use the most current poverty line definition as promulgated by the Office of Management and Budget (OMB), and published in the U.S. Federal Register to establish eligibility for CSBG services. Essentially, the term Apoverity line@ means the official poverty line defined by OMB based on the most recent data available from the U.S. Bureau of the Census. The HHS/OCS revises annually (or at any shorter interval they determine to be feasible and desirable) the poverty line, which is used as a criterion of eligibility in the CSBG. The required revision is accomplished by multiplying the official poverty line by the percentage change in the Consumer Price Index for all urban consumers during the time at which the revision is made. *Whenever the State determines that it serves the objectives of the CSBG Program, it may revise the poverty line to not exceed 125% of the official poverty line otherwise applicable in the CSBG Act. The State of Wyoming has previously chosen to not revise the poverty line above 100%.*

Based on requests from Tripartite Boards to review the guideline for exceeding the poverty line in Wyoming, Community Services Programs has modified its earlier ruling as follows: Following thoughtful discussion by a Tripartite Board, that board may, at its discretion, allow specific areas whose economies cause a hardship for low-income people at the 100% level to increase that level not to exceed 125% of the official poverty line. Such discussion should include recognition that CSBG funding is limited and often insufficient to make a major impact on poverty reduction in a community; and that increasing the eligible population creates a risk of leaving the neediest with too small a pool of available money to meet their basic needs. Any Tripartite Board adopting the practice of increasing the poverty line as noted above, must notify Community Services Programs of its decision, and include the rationale for making that decision as part of the Tripartite Board's minutes for review by any interested party.

The latest annual update of the HHS Poverty Guidelines (Federal Register, Vol. 73, No. 15, January 23, 2009) is included in the CSBG Operations Manual, which is an attachment to this Plan.

Wyoming State Population/Characteristics:

As of July 1, 2008, the U.S. Census Annual Estimates of the Resident Population by Sex, Race, and Hispanic origin for Wyoming reflect the following data:

Total all persons	532,668	100.0%
Males	270,190	50.7%
Females	262,478	49.3%
White	500,001	93.9%
Black	6,884	1.3%
American Indian	13,555	2.5%
Asian	3,828	0.7%
Other	8,400	1.6%
Hispanic Origin (of any race)	41,162	7.7%

Note: Categories for statistics in this table conform to those on the Equal Employment Opportunity Commission EEO-4 forms. The "other" category includes persons of all race categories. Hispanic origin is considered an ethnicity, not a race. Hispanics may be of any race.

Geographically, Wyoming is the ninth largest state, composed of 23 counties and the Wind River Reservation, and the state comprises 97,914 square miles. At the same time, it is sparsely populated, ranking 50th of all the states. The 2008 U.S. Census estimated total population figure of 532,668 is a 1.8% increase from the 2007 census count of 523,252.

Examples of large communities with large concentrations of minorities are Cheyenne, Laramie, Casper, Rawlins, Rock Springs, Green River, Riverton, and Lander.

The majority of Native Americans in the state reside on the Wind River Reservation, encompassing 3,532 square miles. This is the only Indian reservation in Wyoming, and home to the Northern Arapaho and

Eastern Shoshone Tribes. Approximately 12% of the Wind River population is non-Indian, with another 12% representing tribes other than Arapaho or Shoshone.

Employment/Unemployment:

The following "employment" and "unemployment" information is derived from the United States Department of Labor, Bureau of Labor Statistics. Wyoming currently has an unemployment rate of 6.6%, which over the year, has increased by 3.2%. Although 6.6% is extremely high for Wyoming, it is much lower than the national rate of 9.7%. The record high unemployment rate was in May of 1983 at 10.1% and the record low was in February 1979 at 1.9%.

Calendar Year	Labor Force	Employed	Unemployed	Unemployment Rate
2005	278,302	267,648	10,654	3.8
2006	284,365	275,137	9,228	3.2
2007	289,108	280,732	8,376	2.9
2008	293,841	283,951	9,890	3.4
2009	291,213	272,088	19,125	6.6

SERVICE DELIVERY SYSTEM

A description of the State of Wyoming=s CSBG service delivery system is essentially comprised of (1) activities and services to be performed and provided; (2) the service providers utilized, i.e., eligible entities and subcontractors; and (3) the geographic areas of the state for CSBG activities. A description of each of these categories follows.

Activities and Services:

Activities and services provided in Wyoming=s CSBG Program will reflect the diversity of the needs of low-income individuals and families. Such needs will be determined primarily by the low-income people themselves through (1) their input from their representation on eligible entity tripartite governance boards, (2) local and state level public hearings, (3) the best and most recent available poverty data and information, (4) data and information derived from local needs assessments which will be conducted in each geographical area, and (5) input from local and state level human services providers, along with other information from knowledgeable individuals and organizations relative to the poor.

It is strongly intended that the funds provided to CSBG eligible entities and subcontractors be used to increase the levels of services and activities, or to increase the types of services and activities provided to the poor, including elderly, and not be used to replace previous appropriations of local funds for these purposes. Clearly, the State will not allow the supplanting of other funds with CSBG funds.

Funds made available through the CSBG will only be used:

- (A) to support activities that are designed to assist low-income individuals and families, including people receiving assistance under Part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), the Personal Opportunities With Employment Responsibilities

(POWER) Program, which is Wyoming=s version of the federal Temporary Assistance for Needy Families (TANF) Program, homeless individuals and families, migrant or seasonal farm workers, and elderly low-income individuals, to:

- (i) remove obstacles and solve problems that block the achievement of self-sufficiency, including self-sufficiency for those in transition from the TANF/POWER (welfare reform) program;
 - (ii) secure and retain meaningful employment;
 - (iii) attain an adequate education, with particular attention toward improving literacy skills of the low-income families, which may include family literacy initiatives;
 - (iv) make better use of available income;
 - (v) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent needs; and
 - (vi) achieve greater participation in communities= affairs, including development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to:
 - develop methodologies and document best practices for replication of successful grassroots intervention in other areas;
 - strengthen and improve relationships with local law enforcement agencies, which may include activities such as neighborhood or community policing efforts;
- (B) to address the needs of youth in low-income communities through youth development programs which support the primary family role, give priority to prevention of youth crime and problems, promote increased community coordination and collaboration in meeting youth needs, and support development expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as:
- (i) violence-free zones;
 - (ii) after-school childcare programs; and
- (C) to make more effective use of, and coordinate with, other programs related to the purposes of the CSBG (including POWER/TANF and State Welfare reform) efforts.

CSBG eligible entities and subcontractors will implement this section of the CSBG Act through many diverse programs and activities. Conceptually, programs have changed each year to varying degrees based upon the respective local needs and resources with regard to the low-income population.

CSP monitors compliance with CSBG assurances using a process designed to document program accomplishments along with planned outputs. The planned work programs outline problems, goals, target populations, strategies, and projected outcomes. The program performance and fiscal reports detail achievements, expenditures by categories, people assisted by service categories, client characteristics, and a vast array of other appropriate and pertinent information. Such reports are submitted to CSP on a monthly basis, in addition to an annual report from each eligible entity and their subcontractors.

In terms of the range of services and activities, the CSBG has historically been, and will continue to be, an extremely vital part of the human service system in Wyoming. CSBG funds are used for program operations, i.e. development, planning, implementation, operation, monitoring, evaluation, fiscal control, policy analysis, staff development, board training, needs assessments, and a myriad of other uses. These, when combined with direct client service activities, provide a comprehensive, multi-faceted approach to identifying and resolving problems and issues, and to eliminating conditions of poverty. The CSBG service delivery network is responsible for a very wide range of activities, consistent with the CSBG Act.

Specific Activities:

The CSBG Act delineates assurances which govern the use of CSBG funds. The State of Wyoming has identified and prioritized specific problem areas as those for which services and activities are provided, and for which specific information is documented and reported. Eligible entities and their subcontractors develop specific strategies to resolve those problems.

Information and referral, advocacy, counseling, and application of assistance are strategies which ensure effective delivery of services designed to meet a wide spectrum of needs. These strategies provide essential assistance, as a prelude to solving specific problems. The following is a list of some of the programs or projects operated by local CSBG eligible entities and their subcontractors in each of the 676(b)(1) assurance area.

Removal of Obstacles to Self-Sufficiency: People in poverty situations are often at the complete mercy of the confusing and complex systems that are designed to meet their needs, but often do not (for a variety of reasons, most particularly the lack of having an advocate to emphasize self-sufficiency through the removal of the myriad of barriers or obstacles to them). The intent of the State and its CSBG programs are to strive for self-sufficiency, as opposed to a Aquick fix@. However, oftentimes in crisis intervention situations, a Aquick fix@ must occur before self-sufficiency activities are to take place.

Secure and Retain Meaningful Employment: The State and its grantees clearly recognize the obvious connection between meaningful employment and the elimination of poverty. Grantees work closely with many private and public organizations to this end. Specific employment activities include information and referral and follow-up, job counseling, job development and placement, summer youth jobs, work experience, employment generating projects, skill training, job banks, elderly jobs programs, disabled jobs programs, advocacy or brokerage, self-sufficiency programs, case management, and others.

Attain an Adequate Education: Similar to "employment", the relationship between education and elimination of poverty is evident, and is clearly recognized by the State and its grantees. Specific educational activities include information and referral and follow-up, counseling and guidance, public education and public information about poverty and related conditions, support of Head Start programs,

daycare and parenting, alternative educational measures, literacy, bilingual, early childhood development, and others.

Better Use of Available Income: It is very clear that low-income people must make the best possible use of all resources that are available to them. This is why sound information and referral systems, with good follow-up capabilities are so important in assisting people with multi-problems. Some specific activities in this category include household and financial counseling, income tax counseling, energy conservation activities, public information relative to services available through all public and private means, weatherization services, alternative energy services, advocacy and brokerage, auto and home repair, consumer education and counseling, family planning, food cooperatives, farmer's markets, community gardens, and others.

Obtain and Maintain Adequate Housing: The lack of adequate and affordable housing for low-income people over the past decade has been staggering. To this end, the State of Wyoming utilizes various activities for dealing with this substantial problem. Some of those activities include information and referral and follow-up, homeowner counseling, loan assistance, landlord-tenant issues, rental and mortgage assistance, home repair, rehabilitation and weatherization, utility assistance, energy conservation activities, direct shelter activities, homeless prevention activities, and others.

Obtain Emergency Assistance: In many instances (if not most), problems encountered by low-income people need immediate resolution. This is particularly true with crisis intervention situations, i.e., the lack of food, clothing, shelter, or urgent medical needs. Traditionally, the emergency assistance category has been the largest in Wyoming's CSBG program in terms of the numbers of people served, and funds expended. Specific activities include immediate medical care, food, clothing, shelter, cash assistance, loans, crisis intervention of various kinds, donations of food, fuel, gas, car or home repair, utility assistance, and others. CSBG emergency assistance is provided only as "last resort", whereby a person is not eligible for any other public or private service. The largest expenditures and the largest number of people served in the emergency assistance category have been medical services.

Greater Community Participation: When low-income people have no forum from which to be heard, the task of eliminating poverty becomes that much more difficult. Because of the lack of technical knowledge of governmental systems, and oftentimes a lack of self-esteem, low-income people do not participate and/or contribute to the local decision-making processes concerning issues that directly affect them and their families. Some activities designed to increase such participation in community affairs include encouraging more low-income people to become members of advisory councils, task forces, boards, and other such groups, recreational and educational activities designed for social contact and information gathering, community forums, media releases, newsletters, peer programs, VISTA Volunteers, youth development, community organizing and others. Low-income people will be heavily involved in the CSBG network through their active participation in the tripartite governance boards, which will be used by all CSBG recipients.

Counteract Conditions of Starvation and Malnutrition: Health needs of anyone are crucial ones, and this is particularly true with low-income people because of their lack of resources. This becomes more crucial when those health needs relate to the lack of nutrition. Nutrition and feeding programs have escalated drastically in Wyoming's CSBG program over the years. Some of the specific activities designed to help in this area are information and referral and follow-up, nutritional counseling, surplus food distribution,

congregate feeding, food banks, hot meals projects, transportation to meals projects, garden projects, food processing, food basket programs, nutritional education, home-delivered meals, soup kitchens, community gardens, and others.

Conditions to be Addressed:

Conditions to be addressed are as a result of needs assessments conducted by grantees. The conditions listed below are not all inclusive, but are indicative of the conditions that will be addressed. They are arranged to correspond with the three categories of CSBG national Goals: (1) individuals/families; (2) community; and (3) agency.

Conditions Relating to Individuals/Families (Assurance 1): Poverty; Discrimination; Lack of meaningful jobs that pay good wages and benefits; Lack of support for those transitioning off welfare; Dependency on social services organizations; Limited opportunities for economic self-sufficiency for pregnant and parenting teens; Inadequate client knowledge of and access to services; Inadequate knowledge and skills to deal effectively with issues affecting safety, sanitation, and quality of life; Insufficient development and coordination of support for parents and families necessary to increase stability and self-reliance; Lack of insurance coverage.

Health Inadequate, inaccessible, unaffordable health care; Increases in incidences of alcohol and/or drug abuse; Barriers to the testing for, and treatment of, and curbing the spread of infectious diseases; Adolescent pregnancy; Inadequate parenting skills; Pregnant youth who are at-risk; Affordable dental care for Medicaid population, particularly children; Lack of bilingual health providers; Independent living options for youth and adults; Increase in the incidence of child abuse; Increase in cases of elder abuse; Juvenile delinquency prevention; Lack of early intervention and diagnoses of disabilities in low-income children; Increase in domestic violence.

Employment (Assurance 1(2): Insufficient full-time jobs with adequate wages and benefits; Inadequate employment services systems; Insufficient on-the-job training opportunities; Loss of jobs due to layoffs and reductions; Disasters; High unemployment rate; Lack of job opportunities due to state economy; Inadequate comprehensive job skills training, including survival skills, specialized training, and training for teens; Need for higher paying jobs; Training programs to prepare low-income people for jobs; Non-traditional employment opportunities.

Education (Assurance 1(3): High school dropout rate; Unprepared for workforce; Literacy and language problems; Lack of appropriate literacy and alternative education; Schools need earlier delinquency prevention; Lack of early childhood education; Inadequate education for young children; lack of adequate systems for homeless families.

Income Use (Assurance 1(4): Limited knowledge about budgeting; Limited resources to purchase safety restraints or devices (i.e., bike helmets, etc.)

Housing (Assurance 1(5): High cost of housing and utilities; Lack of available and/or affordable housing; Lack of permanent and safe housing; Increase in number of people who are homeless; Insufficient knowledge and resources for home ownership.

Greater Participation (Assurance 1(6): Limited family counseling; Limited activities to prevent homelessness; Limited career exploration opportunities; Limited employment opportunities for seniors; Lack of adequate support systems for the elderly; Lack of access to affordable legal services; Lack of cultural enrichment; Lack of substance abuse and/or alcohol prevention; lack of recreational programs for at-risk before, after, and on holidays; Lack of transportation to Medicaid, human services, training, and work sites; Increases in the number of grandparents who are primary care givers; isolation of the elderly.

Greater Participation and Linkages (Assurance 1(7): Community innovation methods to deal with lack of jobs; Need to increase networking and collaboration; Lack of public transportation; Limited resources to address racism and discrimination; lack of awareness of the services of community action agencies, and related organizations; Strained relations with minority community and increased acts of discrimination; inaccessibility of services; Lack of involvement of low-income people on policy-making boards of organizations; Unresponsive community governments; Lack of safe, and adequate, daycare.

Conditions Relating to Agency(s) (Assurances 5, 6, 9): Inadequate data collection and analysis; Insufficient family development/case management capacity; Lack of central intake system; Limited funds for facility maintenance and expansion; Inadequate staffing, particularly in outreach; Facilities not conducive to centralized services; Lack of computers where necessary; Turf and control problems with other organizations; Significant staff turnover; Lack of orientation for new staff and new board members; Lack of staff development and training; CSBG computer program does not track outcomes and/or case management information; Lack of program evaluation; Obsolete management documents systems; Need more Head Start classrooms; Need training for home-based daycare businesses; Increased demand for services; Funding inadequate to meet increased demand for services; Tools to manage outcomes; Diversification of funding resources; Inadequate resources for program development and expansion; Development of managerial plan that will increase operational efficiency; Lack of formal, uncoordinated planning with other services providers, and within the agency; Under-utilization of agency and community resources; Inadequate partnerships with employers to target and generate jobs for low-income people; Barriers to providing quality client services; Inadequate knowledge of staff views regarding issues of diversity (ethnic/racial/cultural); Limited involvement of the governing board; Inadequate training for governing boards and councils; Weak interaction between area advisory councils and the board; Achieve and maintain full board membership; Greater participation in community efforts and activities; Community needs to be involved in the activity of the agency; Improved outreach and marketing; Increased need for fundraising to support program activities; Non-traditional means of obtaining resources.

Service Providers:

Providers of CSBG services and activities will be (1) eligible entities, through direct assistance to clients, and/or service providers (or subcontractors). The majority of direct client assistance will be provided by human services providers, some of them being CSBG service providers in past years, as well as some who have not been CSBG providers in the past. It is anticipated that around one hundred seventy-five (175) service providers (subcontractors) will be participants in the local CSBG programs.

The service providers will be monitored by both the CSP and the respective eligible entity on a local level.

COORDINATION, LINKAGES, AND NETWORKING

All CSBG eligible entities are responsible for the selection and implementation of programs that will have maximum community impact, consistent with the purposes of the CSBG. Community organization and resource mobilization are integral and invaluable parts of local CSBG operations.

Eligible entity applications, reports, and other feedback demonstrate eligible entities' and subcontractors' abilities to draw from a diverse variety of funding sources to build comprehensive programs and to manage an array of resources that will serve the needs of the community.

A detailed description of coordination, linkages, and networking for each eligible entity is a requirement for CSBG funds, and must be included as part of its community action plan which must accompany the application to CSP.

Most Wyoming counties have established groups, which serve the purpose of planning, implementing, monitoring, and evaluating their local CSBG programs. Coordination, linkages, and networking are necessary factors in establishing effective local CSBG programs for these groups. Examples of such groups are discussed in the "Service Providers/Eligible Entities" Section of this Plan.

Generally, local CSBG programs work with virtually all of the other human services programs. Because of its flexibility, the CSBG has played a very key role in the resolution of poverty and associated problems in communities. Local CSBG programs routinely perform information and referral services on a daily basis, as well as receiving referrals from other entities.

As alluded to previously, CSP reviews eligible entities' applications for funding with emphasis on the local community action plan for assessment of coordination, linkages, networking, and non-duplication of efforts. Local community action plans must show evidence of coordination and linkages with related public and private sector activities, and evidence that CSBG funded activities will not duplicate other efforts. In short, activities may supplement other efforts, but they cannot supplant.

CSP fully expects local eligible entities and their subcontractors to continue meaningful participation of public, private, and low-income sectors in the planning and operations of local CSBG programs. Through the analysis of the local problem identification and the description of the service delivery system identified in the local community action plans, the existing resources are to be identified and maximized for the most efficient and cost effective delivery of services for low-income people. The coordination and linkages necessary to achieve this will be the responsibility of the local CSBG eligible entities and their subcontractors and will be documented for each program or project.

In their application to CSP, eligible entities must provide signed assurances to the State, and how they intend to implement each assurance. These are essentially the assurances that the State provides to HHS/OCS, that are applicable to local eligible entities.

Coordination effort objectives at both the state and local levels are (1) to establish effective linkages with other programs, both public and private sectors, (2) to reduce the possibility of duplication, and (3) promote and maximize resource mobilization.

Because the CSBG Program is essentially the only one with a statutory responsibility that places major emphasis to coordinate and link the entire range of public and private resources at the state and the local levels to assist low-income people, the State's efforts in meeting this mandate have been very successful through the years.

Wyoming is very fortunate to have dedicated local service providers that routinely coordinate and link up in a meaningful fashion on behalf of their constituencies. Because of economic issues, budget cuts, and as a result, the needs of low-income people escalating, this has become a very crucial issue. CSP has had very little problem with regard to local coordination and networking issues.

Further information regarding coordination, linkages, and networking is contained in the State's response to federal assurance 676 (b)(5), with particular emphasis on the local workforce investment systems under the Workforce Investment Act of 1998.

While direct client assistance is obviously the major component of Wyoming's CSBG program, advocacy, community organizing, and resource mobilization is an integral part of it. This very crucial link is the primary difference between the CSBG and other human services programs.

In Wyoming, this category has traditionally been the largest in terms of people served and funds expended, just below the emergency assistance category. Some of the specific activities are information and referral and follow-up, local needs assessments, community outreach, human services directories, advocacy, and the general overall State emphasis of improving the coordination and networking of all public and private organizations. Some of the major programs that will be working exceptionally close with CSBG programs are Public Health Nursing Services, Department of Family Services, Vocational Rehabilitation, weatherization programs, low-income energy assistance programs, aging programs, food stamps, JTPA (Job Training and Partnership Act) programs, community college programs, developmental disabilities programs, mental health programs, community development programs, day care programs, foster grandparent programs, volunteer feeding programs, county agricultural programs, ministerial association programs, community alternative programs, emergency shelter programs, homeless self-sufficiency programs, a variety of Indian programs and others, including welfare reform efforts.

The State ensures that the assurances with regard to activities and services, and the uses of the funds will be carried out through (1) contractual agreements with eligible entities, (2) monthly performance and fiscal reports (desk monitoring and analysis), and (3) through on-site monitoring.

Coordination and Partnerships:

Detailed descriptions of coordination/linkages, networking and partnerships has previously been presented in the "Coordination/Linkages/Networks" Section of this Plan, as well as in the State's responses to Assurance 676(b)(5) and 676(b)(6).

The state intends to carry out all of the requirements relating to coordination, linkages, networking and partnerships contained in the Program Overview section on "Coordination/Linkages/Networking" as well as through the interrelated assurances 676(b)(5), 676(b)(6), and 676(b)(9).

Coordination/Workforce Investment Act:

Governor Jim Geringer signed Executive Order 1995-15 on November 16, 1995, which established the Wyoming Workforce Development Council. Duties of the Council include (1) overseeing the creation of a strategic plan for the development of Wyoming=s workforce which assists individuals to become more economically self-sufficient and improves their and their family=s quality of life; (2) building a system of public/private partnerships including participation from business, industry, labor, education, communities and parents which will further the progress of meeting the goals established in the workforce development plan; (3) assessing the adequacy of existing workforce development activities and services being provided in Wyoming and make recommendations to the Governor, State Legislature, or other governing bodies regarding the need for such services, the effectiveness of such services and changes which could improve services provided; (4) developing a performance measurement system which will provide for a consistent and fair evaluation regarding the effectiveness of service deliverers, programs, activities, and services with regard to workforce development; and (5) making recommendations with regard to the coordination of workforce development activities and services which eliminate duplication and increase efficiency among entities providing such services.

Membership of the Council includes CSP, Department of Family Services (DFS), Department of Employment (DOE), Department of Education (DE) Community College Commission (CCC), Department of Commerce (DOC), Vocational Rehabilitation (VR), State Librarian, representatives of industries having a major impact on the State=s economy and employment, representatives of labor, representatives of local government, representatives of local education, and others.

The Workforce Investment Act of 1998, Sec. 111(a) states that the Governor of a state shall establish a State Workforce Investment Board to assist in the development of the State Plan...@ In Wyoming, Governor Geringer has made the decision that the Workforce Development Council will act as the State Workforce Investment Board. The Council is charged with the responsibility of drafting Wyoming=s State Plan, or Unified Plan.

Faith-Based Organizations Collaboration:

The new CSBG Act requires religious organizations to be considered for CSBG funding on the same basis as any other non-governmental organization, so long as the program is implemented in a manner consistent with the Establishment Clause of the First Amendment to the U.S. Constitution. Neither the Federal Government nor the state or local governments receiving funds under the CSBG shall discriminate against an organization that provides assistance under, or applies to provide assistance under, the CSBG on the basis that the organization has a religious character. A religious organization that provides assistance under the CSBG shall retain its religious character and control over the definition, development, practice, and expression of its religious beliefs.

The religious program may not support religious activity or compel participants to adopt or participate in religious teachings or practices. A religious organization may not use CSBG funds for sectarian worship, instruction, or proselytization. It may, however, retain its religious character and not be forced by any government to alter its form of governance (other than creating a Tripartite Board) or remove religious art, icons, scripture, or other symbols.

Religious organizations may now be designated as new eligible entities in unserved areas, but only if all the requirements applicable to other private non-profit organizations, such as a Tripartite Board, location in the geographic area to be served, ability to provide a broad range of services designed to eliminate poverty and foster self-sufficiency, and demonstrated effectiveness in meeting CSBG goals and purposes, are met.

No funds provided directly to a religious organization to provide assistance under the CSBG shall be expended for sectarian worship, instruction, or proselytization.

Any religious organization providing assistance under the CSBG shall be subject to the same regulations as other non-governmental organizations in terms of fiscal accountability, in accordance with generally accepted accounting principles for the use of CSBG funds.

The religious organization must segregate government funds provided under the CSBG into a separate account. Only the CSBG government funds shall be subject to audit by federal, state, or local governments.

If an eligible entity or other organization (such as subcontractors, or consulting groups, referred to in the CSBG Act as "intermediate organizations"), acting under a contract, or grant or other agreement, with the federal state, or local governments, is given the authority under the contract or agreement to select non-governmental organizations to provide assistance under the CSBG, the intermediate organization shall have the same duties as the Federal, state, and local governments.

For any program carried out by the Federal Government, or by a state or local government under this subtitle, the government shall consider, on the same basis as other non-governmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution. Neither the Federal Government nor a state or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.

A religious organization that provides assistance under a program described in Section 679, subsection (a) of the Act shall retain its religious character and control over the definition, development, practice, and expression of its religious beliefs.

Neither the Federal Government nor a state or a local government shall require a religious organization--

- (A) to alter its form of internal governance, except (for purposes of administration of the Community Services Block Grant program) as provided in section 676B; or
- (B) to remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).

A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-1) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).

CSP will continue to solicit from, and encourage participation by, appropriate religious organizations in the state (i.e., the Wyoming Church Coalition and other such groups) for the potential of becoming CSBG eligible entities. Historically, the state has worked for a number of years with religious organizations as service providers, including several Salvation Army unities, Cooperative Organizations Ministry for Emergency Assistance (COMECA) in Cheyenne, Mother Seton House and the Central Wyoming Rescue Mission in Casper, and several Inter-Faith organizations.

COORDINATION WITH OTHER PUBLIC AND PRIVATE RESOURCES

The State ensures that coordination between antipoverty programs in each community in the state, and also ensures that emergency energy crisis intervention programs under title XVI (relating to low-income home energy assistance) are conducted in such communities. This will be verified through local applications, desk monitoring (monthly reports), and on-site monitoring.

Further detail regarding coordination between poverty programs is found in the "Coordination/Linkages/Networking" Section of this Plan, in addition to the State's response to Assurance 676(b)(5) which also is interrelated with 676(b)(6).

The CSBG Program Manager is also designated by the Governor as the State Homeless Coordinator. These duties are obviously closely intertwined with the purposes of the CSBG. Further, the Wyoming Community Services Programs (CSP) staff are members of many public and private sector groups (both formalized and informal) that relate to the purposes of CSBG. Further, as stated in other sections of this Plan, the improvement of coordination and networking on both the state and local level is a top priority with the CSP.

CSP review of CSBG grantee applications includes assessment of the following:

- (1) Coordination and Non-duplication of Efforts
 - (a) Evidence of coordination and linkages with related public and private activities, and evidence that CSBG funded activities will not duplicate other agencies; however, activities can supplement efforts, but not supplant.

The CSP fully expects local grantees to continue meaningful participation of public, private, and low-income sectors in the planning and operations of programs under the CSBG. Through the analysis of the local problem identification and the description of the service delivery system identified in local community action plans, the existing resources are to be identified and maximized for the most efficient and cost effective delivery of services to low-income people. The coordination necessary to achieve this will be the responsibility of the local grantees and will be documented for each project.

- (2) Coordination effort objectives at both the state and local level are as follows:
 - (a) To establish effective linkages with other state and local programs, both public and private sectors;
 - (b) To reduce the possibility of duplication;

- (c) Promote and maximize resource mobilization.

In as much as most all eligible entities also receive funding from other diverse sources, the prospect of achieving the above goals is greatly enhanced.

Homeless Programs:

Even though Wyoming has not undergone the crisis proportions of homelessness suffered by large urban areas, the incidence of it have escalated drastically since the early 80s. This is primarily due to the ever-sagging Wyoming economy brought on primarily by the international and national energy situation, the demolition of older, low-cost hotels and boarding homes, and the serious lack of affordable housing for its citizens. It is also believed that the nationwide shortage of affordable housing has compounded Wyoming's problems. Furthermore, the southern part of the state has traditionally been heavy traffic for homeless persons simply because of its location -- a crossroads for travel across the length and breadth of the nation (which dates back to the days of the pioneers). Today, the city of Cheyenne is traversed by two major transcontinental highways, as well as routes of other commercial carriers. This central location makes the transient homeless issue particularly apparent in Cheyenne. Further, many local Wyoming residents are homeless, or in the stage of becoming homeless, primarily due to Wyoming's economy.

As alluded to above, about 90% of homeless people to whom services are provided in Cheyenne are transient. Homeless people provided services in Casper (about 180 miles north) tend to be about 80% local and 20% transient. Still further north in Riverton (about 130 miles) the homeless population tends to be 95% local and 5% transient.

Wyoming's homeless tend to fall into three categories; (1) people who suffered fairly recent economic setbacks, and/or eviction or imminent eviction from their homes; (2) people who have experienced severe personal crises, i.e., divorce, domestic violence, incarceration, hospitalization, being stranded; and (3) people who are chronically mentally ill and/or have problems strongly associated with alcohol or drugs.

The CSBG has worked, and will continue to work, very closely with all homeless/shelter programs. These programs simply could not work in Wyoming without the help of the CSBG network. Homeless program funding in Wyoming is extremely minimal.

CSP, in addition to administering the CSBG is responsible for administering the Emergency Shelter Grants (ESG) Program; a categorical program for homeless individuals and families, which is funded by U.S. Housing and Urban Development (HUD). This program is very closely intertwined and coordinated with the CSBG. CSBG eligible entities and subcontractors are the grantees for Wyoming's local ESG program which helps immensely in the necessary coordination between it and the CSBG.

The CSBG also provides supplemental funding for Wyoming's two counties that operate the HealthCare for the Homeless (HCH) Program. CSP has sponsored two homeless surveys and accompanying needs assessments for the homeless population within the past five years. The CSBG network was the primary key in making these surveys/needs assessments meaningful and informative.

Hunger/Feeding Programs:

Hunger is clearly one of the most visible and key elements of poverty. Many people are unable to eat adequately or nutritiously because of the lack of resources. The amount of CSBG funds for feeding and nutrition programs in Wyoming has risen each year since its inception in 1982. Each year, more local grantees are choosing to use more funds for these types of programs. As mentioned in other parts of this Plan, the "emergency assistance" category is the most used in Wyoming's CSBG program. Within that, "health services" are the most used, both in terms of funds spent and people served. Peoples' health is clearly the top priority in Wyoming's CSBG program, and the provision of nutrition and food services clearly are most crucial.

The CSBG is the key facilitator for the state-wide "Hunger/Nutrition Survey and Needs Assessment" which was completed in late 1998. Many diverse public and private sector programs and organizations are involved in the project. The goals were to (a) establish an on-going state-wide hunger coalition, (b) conduct a state-wide hunger/nutrition needs assessment (respondents being low-income people, agencies and organizations); (c) develop a report of the needs assessment findings with recommendations; and (d) develop a state-wide hunger/nutrition resource directory for use by the general citizenry (with emphasis on the low-income population) and a diverse array of public and private sector programs and organizations. The data was compiled by the Northwest Community Action Programs of Wyoming, Inc. (NOWCAP).

INNOVATIVE COMMUNITY AND NEIGHBORHOOD INITIATIVES

CSP will strongly encourage local eligible entities and their subcontractors to initiate innovative community and neighborhood-based initiatives related to the purposes of the CSBG, which may include fatherhood initiatives, where necessary, and other initiatives with the goals of strengthening families and encouraging effective parenting.

A description of how local CSBG programs will perform these initiatives must be included in their local applications to CSP, and through their respective community action plans. Eligible entities must also describe how they will implement their signed assurances with regard to these initiatives.

Community Needs Assessments:

The CSBG Act requires the State to "secure from each eligible entity in the state, as a condition to receipt of funding by the entity, a Community Action Plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State Plan) that includes a community-needs assessment for the community served, which may be coordinated with community needs assessments conducted for other programs."

The State ensures that it will comply with this assurance through the application, contractual, and monitoring process. Needs assessments are but one component of the Community Action Plans. Such Community Action Plans including their key component, the needs assessments, are a requirement for CSBG funding. They must be included in the eligible entities' respective Community Action Plans, and submitted to CSP for approval. As well as the needs assessments data, there will be a full description of the type of needs assessment performed, the methodology, and other pertinent relative information. No contract for CSBG funds from the State to a respective eligible entity will be established unless the needs assessment requirements are fully met. Such assessments will be analyzed by CSP commensurate with respective

eligible entities= application and plans for CSBG activities to assure that CSBG program activities and services designs were based upon results from the respective needs assessments. Further, needs assessment assurance will be reviewed at on-site monitoring visits.

CSP requires that a new needs assessment be performed every three (3) years, with an update being acceptable for the following two years. It is possible, if unique situations and conditions occur in a respective community, that a totally new needs assessment be established at any given time. Further, the requirement for a totally new needs assessment every three years does not preclude local eligible entities from establishing a new (as opposed to an updated) needs assessment more frequently.

Tripartite Boards:

The State assures that each of its eligible entities will establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.

CSP will ensure compliance with this assurance through the verification of Tripartite Board establishment documents and monitoring. (See "Tripartite Board" Section in this Plan for further detail). The establishment of such procedures in the assurance will be a requirement for eligible entities in the establishment process of their Tripartite Board in addition to other requirements, as appropriate. In addition, eligible entities must submit signed assurances to CSP as the State=s assurances to the HHS/OCS (as applicable), and this assurance is clearly applicable. They must describe how they will carry out this assurance through their respective Tripartite Board eligible entity designation or re-designation (as appropriate) request for CSBG funds.

Section 676B of the CSBG Act requires that, in order for a private nonprofit entity or public organization to be considered to be an eligible entity for the purposes of the CSBG Program, it must administer the CSBG through a Tripartite Board or another mechanism specified by the State. Further detail about Tripartite Boards and Wyoming=s plans for meeting this requirement is contained in this section throughout. However, before such presentation, it must be noted that it is the policy of the State that no organization, public or private sector, will be designated as an "eligible entity" for CSBG purposes unless a formal Tripartite Board is not only established, but operates as a Tripartite Board consistent with the Congressional intent, the CSBG Act, and the State Plan with respect to the process for its establishment, and its overall role and purposes for governance and administration of the CSBG Program.

The State of Wyoming=s CSBG network=s local eligible entities will both represent and are accountable to their local communities for the manner in which they pursue their poverty-fighting mission, as well as in the way they use the resources of the CSBG. By statute, CSBG-funded agencies will be governed by a board of directors consisting of elected local public officials, representatives of the low-income community, and appointed leaders from the private sector. This unique Tripartite Board structure is fundamental to the historical Community Action concept. It empowers low-income people to participate directly in the development of responses to poverty conditions (in other words, "bringing them to the table"); at the same time, private and public representatives gain a much clearer knowledge of the issues confronting low-income people in their community. These members offer their unique expertise to the policy-making, business planning, and operational aspects of the eligible entities.

- Private nonprofit agencies: In order for a private nonprofit entity to be considered to be an eligible entity for purposes of the CSBG, the entity shall administer the CSBG through a Tripartite Board that fully participates in the development, planning, implementation, monitoring, and evaluation of the program to serve low-income communities. The members of the board shall be selected by the entity, and the board shall be composed so as to assure that (A) one-third (1/3) of the members of the board are elected public officials holding office on the date of selection to the board, or their representatives, except that if the number of such elected officials reasonable available and willing to serve on the board is less than one-third (1/3) of the membership of the board, membership on the board of appointive public officials or their representative may be counted in meeting such one-third (1/3) requirement; (B) not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members are representative of low-income individuals and families in the neighborhood served; and each representative of low-income individuals and families selected to represent a specific neighborhood within a community resides in the neighborhood represented by the member; and (C) the remainder of the members are officials or members of business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served.
- Public Organizations: In order for a public organization to be considered as a CSBG eligible entity, the entity shall administer the CSBG through (1) a Tripartite Board, which shall have members selected by the organization and shall be composed so as to assure that not fewer than one-third (1/3) of the members are persons chosen in accordance with democratic selection procedures adequate to assure that these members (A) are representative of low-income individuals and families in the neighborhood served; (B) reside in the neighborhood served; and (C) are able to participate actively in the development, planning, implementation, monitoring, and evaluation of programs under the CSBG; or (2) another mechanism specified by the State to assure decision making and participation by low-income individuals in the development, planning, implementation, monitoring, and evaluation of programs under the CSBG.

CSP intends to ensure that its assurance to HHS/OCS for Tripartite Boards is carried out through various ways. First, local eligible entities must submit signed assurances to CSP, as with the State=s assurances to HHS/OCS (as applicable) with the Tripartite Board assurance being one of them. As part of eligible entity=s application to CSP for CSBG funds, it must have first been designated as an eligible entity by CSP. From a timing perspective, those agencies choosing to become eligible entities by establishing a Tripartite Board should have been designated several months before the funding application to the State is due. However, those still in process of establishing a Tripartite Board at application time will be considered, but will not be provided any CSBG funds until the board establishment is completed, and the board has been formally designated as an eligible entity by CSP.

Information and documents that will be required by CSP for approval (or designation) of an entity=s Tripartite Board status will include:

- copy of signed resolution formally approved by the entity=s governing board to form a Tripartite Board for CSBG purposes;
- official name of the governing board/entity;
- copy of approved and signed by-laws that clearly state the intent, purposes, roles, and responsibilities of the board for CSBG purposes, as well as other appropriate information generally associated with organizational bylaws;
- copy of Articles of Incorporation (501(c)(3) status (for Private Nonprofit Corporations only);

- a list of the board members, their terms of office, what category of the Tripartite Board they represent, identified by name, address, phone number, job title, and employer;
- an explanation of how members were appointed to the board consistent with the CSBG Act;
- a description of the procedures in place (from the bylaws) to ensure that low-income individuals, community organizations, and religious organizations can petition for adequate representation on the board if such individual or organization considers itself to be inadequately represented;
- a description of how the board will fully participate in the (1) development, (2) planning, (3) implementation, (4) monitoring, (5) evaluation, and (6) overall management of its CSBG programs;
- evidence that the organization has the capacity to deliver a broad range of services;
- a description of the process for solicitation of board members, election of board members, appointment of members, how board vacancies will be handled, terms of office, board meeting frequency, verification through newspaper articles or flyers, etc.;
- assurances by the board (from the bylaws) that all meetings will be conducted formally (i.e., official minutes of proceedings, Roberts= Rules of Order, and other generally accepted board principles);
- a description of where professional board files will be kept (i.e., CSBG documents, board minutes, program reports, and other appropriate documents);
- a list of board officers and contact information (i.e., chairperson, co-chairperson, secretary, treasurer, and length of terms and brief (board) job descriptions or roles and responsibilities);
- a description of what individuals will be performing what types of day-to-day tasks for the board (i.e., CSBG financial and performance reporting, overall management and administration, preparation of materials for board members and related areas);
- how the board will develop policies (for the bylaws) that address possible "conflicts of interests" issues with regard to board members (i.e., representatives of human services provider agencies (CSBG subcontractors) cannot be board members, no clients of human services provider agencies (CSBG subcontractors) can be board members), or any other areas where a potential board member or a sitting board member may be subject to a conflict of interest;
- a detailed description of the process the board will go through to formulate the community action plan, which is the primary part of the local application to the CSP for CSBG funding (In short, the community action plan will state how and why decisions were made as to what types of local CSBG programs or projects were chosen to be funded, *Wyoma* planning information, and related planning information.);
- a description of the process that will be used by the board to provide Aboard orientation@ to new members relating to board practices, CSBG operations, and other appropriate information;
- assurances that each board member will receive a copy of the CSBG Tripartite Governing Board Manual that was developed by CSP; and
- any other documentation that helps to paint a clearer picture of the eligible entity and its operations.

CSP intends to carry out its obligation to HHS/OCS with regard to the Tripartite Board assurance through review of prospective eligible entities= grant applications which are required, to include such information as described in the preceding paragraph; signed assurances from local eligible entities that describe how they will carry out the tripartite assurances.

Training and technical assistance is available for eligible entities, from both the public and private sector, to establish and maintain their respective tripartite governing boards. Such training and technical assistance is available from the CSP.

A state-wide board training session was conducted by CSP and CAA in June, 2001 for the purpose of providing technical assistance to those organizations in the process of establishing tripartite governing boards in order to become eligible entities for CSBG purposes. In addition, the CSP have been providing

further information and advice to those organizations around the state in the process of establishing such boards.

Tripartite Governing Board Manual

In the spring of 2000, the CSP completed a CSBG Tripartite Governing Board Manual which was distributed to all prospective CSBG grantees, and other appropriate sources. The Aover 100 page manual@ was used extensively by organizations in establishing their tripartite governing boards. In addition, training sessions were held regarding the Manual and related issues. Copies of the Manual are available from the CSP. A summary of the contents of the Manual follows:

Overview; Legislation; Eligible Entities; Governance Requirements; Tripartite Boards of Directors; Board Memberships (both Private Nonprofit Corporations and Public Agencies); Elections for Low-income Representatives; Membership for Multi-county Organizations; Conflicts of Interest; Check List for Board Applications for Eligible Entity Designation.

A few other highlighted areas include: Organization and Composition of Boards; Articles of Incorporation; Board operations, including Governance, Leadership, Planning, Public Policy, Community Organization, Participation, and Development, Program Implementation, Personnel, Finance, Public/Community Relations, Staff and Board Development, Board Roles, Staff Roles, Board Meetings, Orientation and Retention of Board Members, Board Training, Board Relationships, Board Oversight of Management Systems, Planning, Advocacy, and Participation of Low-income People.

Other information (presented as attachments) to the Manual includes: Planning; Advocacy, Participation of Low-Income People; Documents Related to the CSBG; Board Relationships; Board Oversight of Management Systems; Group Decision-making; The A-B-C=s of Parliamentary Procedure; What Is a Community Action Agency; The History of Community Action Agencies; copies of bylaws, low-income election processes, and other documents from agencies that have successfully received designation as "eligible entities," and/or "community action agencies."

The CSBG Tripartite Governing Board Manual is currently being updated. The new document will be distributed to Tripartite Boards during FFY 2010.

Community Action Agencies

By definition, a Community Action Agency (CAA) is a private nonprofit organization whose mission is to reduce the causes and conditions of poverty in its geographic coverage area, whose board is broadly representative of three community sectors--(1) low-income people, (2) private organizations, and (3) public agencies--and whose status as a CAA is the result of an explicit designation as such by a local or state government. The board referred to is the tripartite governing board which all CSBG eligible entities, beginning in FFY 2000, must be governed by and through.

In terms of its structure and mode of operation, a CAA:

- serves the entire low-income population in a designated geographic area;
- involves low-income people in planning, administering, and evaluating its programs;

- has a governing board that consists of members of whom at least one-third are persons democratically selected (voting) to represent low-income people; one-third are local public officials of their designees; and the remainder are representatives of business, industry, labor, religious, law enforcement, social welfare, or other groups in the community;
- has received designation as a CAA by local government under the provisions of the Economic Opportunity Act of 1964 (which also required recognition by the U.S. Office of Economic Opportunity (OEO) or by the State under the Coats Human Services Act of 1998 (the latest reauthorization of the CSBG Act);
- is recognized as an eligible entity as defined in the Omnibus Budget Reconciliation Act of 1981, as amended (the initial CSBG legislation), and can therefore receive funding through the State under the CSBG;
- belongs to a national network of similar agencies that, for the most part, received their initial designation by local government, federal recognition, and funding under the Economic Opportunity Act of 1964, as amended.

A CAA carries out its mission through a variety of diverse means that include (a) community-wide needs and resources assessments (or resource inventories or directories); (b) comprehensive anti-poverty plans and strategies; (c) a broad range of direct and indirect (information and referral) services; (d) mobilization of financial and non-financial resources; (e) advocacy on behalf of low-income people; and (f) partnerships with other community-based organizations to eliminate poverty.

Most poverty-related organizations or programs focus on a specific (or categorical) area of need, (i.e., job training, substance abuse, health care, housing, economic development). CAAs reach out to all low-income people in their communities, address multiple needs through a comprehensive approach, develop partnerships with other community institutions, involve low-income clients in the agency's operations, and administer a full range of coordinated programs aimed at having a measurable or potentially measurable impact on poverty; with the ultimate goal of self-sufficiency for low-income individuals or families.

Wyoming currently has five (5) CAA's; (1) Community Action of Laramie County, Inc. (CALC), located in Cheyenne, (2) Northwest Community Action Programs of Wyoming, Inc. (NOWCAP), located in Worland, (3) Community Action Partnership of Natrona County (CAPNC), located in Casper, (4) Community Resource Center of Johnson County, located in Buffalo, and (5) Yellowstone Country Assistance Network, located in Powell.

The first two were designated as a CAA in late 1967 through the Green Amendment passed by the U. S. Congress. Soon after that, Congress passed the Quie Amendment which mandated the tripartite governing board requirement. The third CAA (in Casper) was so designated on May 7, 2001; the fourth (in Buffalo) on October 27, 2003; and the fifth (in Powell) on September 10, 2007.

Because of the new requirement in the CSBG reauthorizing legislation with regard to only Tripartite Boards being CSBG eligible entities, it now will be possible (and likely) that Wyoming will ultimately create more community action agencies. However, it is important to understand that simply because an eligible entity has a tripartite governing board structure, it is not automatically a CAA.

Under the new CSBG Act, the State has the sole authority and responsibility to designate an entity as a Community Action Agency. Legally, there is no local (municipal or county) designation, although a CAA may need a local government's tacit approval to fill its public sector seats on their governing board. It is not

a federal regulation that local government needs to give approval for a new prospective Community Action Agency.

Technically, the designation the State makes is to designate an organization as a "CSBG eligible entity" rather than as a CAA. Here are the requirements that have to be met for the State to designate an organization as a CSBG eligible entity.

- The organization must be in an area that is not served or ceases to be served by an eligible entity. An agency cannot be designated an eligible entity where one already exists, unless the CSP designates the original eligible entity or the existing agency relinquishes.
- The organization must be either geographically located in the area to be served, or be a previously-existing eligible entity in a contiguous or nearby area that will provide services to the area to be served.
- The organization has demonstrated effectiveness in meeting the goals and purposes of the CSBG.
- The State may give priority to existing eligible entities that are already providing related services in the unserved area.
- The State may designate a political subdivision (unit of government) as an eligible entity only if it determines that there is no qualified non-profit organization.
- And, of course, the eligible entity must meet the Tripartite Board composition requirements and the board must "fully participate" in the development, planning, implementation, and evaluation of programs serving low-income people and communities.
- The entity must be capable of providing a "wide and broad range of services" as opposed to limited, categorical services.

Eligible entities that want to become an official CAA must submit a request to the CSP. The primary decision will be based on how each applicant demonstrates how it will achieve the mission of a CAA.

Entities, be they public or private, considering requesting status as a CAA should contact the CSP for further specifics.

Designation of Community Action Agencies

The CSP will consider requests for formal CAA designation on an individual basis, as consistent with federal direction and mandate. It must be made clear that an organization, be they public or private sector, is not necessarily a CAA simply because they operate under the tripartite governing board concept. The following information should help in determining what criteria the CSP will use in determining requests for official CAA status.

What is a Community Action Agency?: Community Action Agencies are private non-profit or public organizations that were created by the Federal Government in 1964 to combat poverty in geographically designated areas. Status as a CAA is the result of an explicit designation by local and state government. A CAA has a Tripartite Board structure that is designated to promote the participation of the entire community in the reduction or elimination of poverty. CAAs seek to involve the community, including elected public officials, private sector representatives, and especially low-income residents, in assessing local needs and attacking the causes and conditions of poverty.

Purpose and Mission: In order to reduce poverty in its community, a Community Action Agency works to better focus available local, state, private, and federal resources to assist low-income individuals and families to acquire useful skills and knowledge, gain access to new opportunities and achieve economic self-sufficiency.

Structure: A CAA:

- has received designation as a Community Action Agency either from the local and state government under the provisions of the Economic Opportunity Act of 1964, or from the state under the CSBG Act of 1981, as amended;
- is recognized as an eligible entity as defined in the CSBG Act and can receive funding from the state under the CSBG;
- has a governing board consisting of at least one-third democratically selected representatives of low-income people, one-third local public officials or their designees, and the remainder representatives of business, industry, labor, religious, social welfare, and other private groups in the community; and
- belongs to a national network of similar agencies, the majority of which received their initial designation, federal recognition and funding under the amended Economic Opportunity Act of 1964.

Mode of Operation: A CAA carries out its mission through a variety of means including (a) community-wide assessments of needs and strengths, (b) comprehensive anti-poverty plans and strategies, (c) provision of a broad range of direct services, (d) mobilization of financial and non-financial resources, (e) advocacy on behalf of low-income people, and (f) partnerships and other community based organizations to eliminate poverty. A CAA involves the low-income population it serves in the planning, administering and evaluating of its programs.

Why Community Action Agencies Are Unique: Most poverty-related organizations focus on a specific area of need, such as job training, healthcare, housing, or economic development. CAA's reach out to low-income people in their communities, address their multiple needs through a comprehensive approach, develop partnerships with other community organizations, involve low-income clients in the agency's operations, and administer a full range of coordinated programs designed to have a measurable impact on poverty and related conditions (i.e., the "working poor").

Who Wants to Be, and What Does it Take to Become a Community Action Agency?: Under the CSBG Act, as amended (the latest being P.L. 105-285), the respective state has the sole authority and responsibility to designate an eligible entity to serve an unserved or underserved area. Legally, there is no local (i.e., county designation) although a prospective Community Action Agency may need a local government's tacit approval to fill its public sector seats on the board.

Technically, the designation the state makes is to designate an organization as a "CSBG eligible entity" rather than as a Community Action Agency. The phrase "Community Action Agency" is almost nonexistent in the current version of the CSBG Act. The following are the requirements that have to be met for the State of Wyoming, through CSP, to designate an organization as a "Community Action Agency," along with correlating "eligible entity" information.

- The organization must be in an area that is not served or ceases to be served by an eligible entity. An agency cannot and will not be designated an eligible entity where one already exists, unless the CSP office de-designates the original eligible entity or the existing agency relinquishes.

- The organization must be either geographically located in the area to be served, or be a previously-existing eligible entity in a contiguous or nearby area that will provide services to the area to be served.
- The organization has demonstrated effectiveness in meeting the goals and purposes of the CSBG.
- The State may give priority to existing eligible entities that are already providing related services in the unserved area.
- The State may designate a political subdivision (unit of government) as an eligible entity only if it determines that there is no qualified nonprofit organization.
- The eligible entity, of course, must meet the Tripartite Board composition requirements and the board must "fully cooperate" in the development, planning, implementation, and evaluation of programs serving low-income people and communities.
- The eligible entity board must have the capability, on their own, regarding staffing and capabilities to operate as a "Community Action Agency" (i.e., to provide a wide and broad range of services, to operate on its own, and fully perform the duties and responsibility of a full-range Community Action Agency).
- An applicant for Community Action Agency designation must demonstrate how it will achieve the mission of a Community Action Agency. It must demonstrate further that it can comply with the requirements of the CSBG statute and the State requirements and that it has local support. Applications will individually be evaluated and scored, but all applicants who meet the minimum qualifications are eligible for request for Community Action Agency designation. The CSP will then make the final decision. Hypothetically, if an eligible entity applies for Community Action Agency designation, and the request is not approved (for whatever reason), the respective eligible entity will have further opportunity to submit further requests based upon the criteria established by the CSP.

Wyoming Community Action Partnership:

The Wyoming Community Action Association (WCAA) was established in 1999 to assist in the State=s efforts to increase visibility and advocacy for low-income human services programs, with emphasis on the CSBG.

Specific activities include the provision of training and technical assistance and training to local communities in close coordination with the CSP, strategic planning, and increasing partnerships with all public and private sector human services programs assisting the state=s three community action agencies, and related responsibilities.

During Calendar Year 2002, the name of the Wyoming Community Action Association was changed by board action to the Wyoming Community Action Partnership (WCAP). WCAP drafted bylaws and Articles of Incorporation, and officially became a nonprofit corporation under Section 501(c)(3) of the Internal Revenue Code.

Through its Executive Director, the CSP provided training and technical assistance to member and non-member organizations, in coordination with the Wyoming Community Services Programs (CSP) toward establishing and effectively operating tripartite governing boards.

In June of 2008, the Executive Director tendered his resignation and the Board chose to not immediately replace him. Activities once designated to the WCAP have been absorbed by the CSP staff and, as of the publication of the FFY 2010 State Plan the WCAP remains inactive.

Training and Technical Assistance:

WDH/CSP intends to furnish prospective grantees, grantees, and subcontractors with meaningful technical assistance and/or training to the degree necessary and practical. This will be accomplished partially through the A5% Federal Discretionary,@ as well as through WDH/CSP Administrative funds.

It is anticipated that the majority of such requested assistance will be in the areas of; establishment and operation of tripartite governing boards, establishment and operation of Management Information Systems (MIS) due to the requirement for increased client and financial data, Community Action Plans, Needs Assessments, Governing Board operation, grant-writing, fund-raising, contract management, economic and community development, welfare reform coordination, minority youth development, problem solving, improvement of local infrastructures, transportation systems for the low-income, elderly and the handicapped, homeless issues, cultural, social and programmatic issues associated with Native Americans, and other appropriate areas associated with poverty and related issues.

Charity Tax Program:

The new CSBG Act provides for charity tax credit designed to increase charitable contributions to organizations which assist low-income people. The theory is that using CSBG funds to reimburse states for revenue lost as a result of charity tax credits will encourage more states to adopt the tax credit, which in turn will encourage more individual charitable contributions to charities serving the poor.

The new provision allows such states to use for any purpose (except legal assistance and tuition vouchers) that portion of their CSBG allocation not distributed to eligible entities which is equal to or less than the amount of tax revenue lost as a result of the credits for certain charitable contributions. In other words, the State may use the 10% of CSBG funds it is not required to distribute to eligible entities.

To qualify, the contribution must be made to a tax-exempt charity, eligible entity, or public housing agency which assists low-income people.

The State of Wyoming is currently not involved in the Charity Tax Credit Program inasmuch as the new provision applies only to those states which give income tax credits (as opposed to deductions) from taxable income to taxpayers for charitable contributions.

Local (Grantee) Systems Overview:

The following is a brief vignette of the local grantee (or eligible entity) and subgrantee (subcontractor) system and requirements. This section is not all-inclusive, inasmuch as local CSBG requirements are pervasive throughout this Plan and its attachment, the CSBG Operations Manual. In short, the system that will serve as the basis for local CSBG operations has three primary components, (1) planning phase, (2) application phase, and (3) an operations and contract management phase.

Prospective grantees will be required to carry out specific planning activities. Briefly, these will consist of efforts to rank community problems in terms of their relative severity, based on a needs assessment; to analyze resources available to address such problems; to set priorities; and to identify both problem causes and strategies that could potentially be used to address the causes or problems. A summary

of these activities will be included as part of the local application process to CSP.

All prospective grantees will be expected to submit application phase materials also. These will describe program purposes, goals, objectives, activities, strategies, and other information associated with the *WyoROMA* Process. This will also include information that will be used in later monitoring and evaluation efforts.

The contract management phase (or component) will consist of those requirements and activities necessary to ensure that all CSBG expenditures meet accounting and management standards, in addition to those requirements that relate to efficiency and effectiveness of program performance.

Local grantees will be held responsible for ensuring that they will monitor their subgrantees both through desk monitoring (fiscal and performance reports) and on-site monitoring. Local grantees will be responsible for preparing and submitting the appropriate monthly fiscal and performance reports to CSP by the 10th working day of each month, for the transactions and activities for the previous month. The reporting system will be closely monitored by CSP to ensure reports are correct and timely. It is the responsibility of the grantees (eligible entities) to establish Management Information Systems (MIS) procedures to assure that their subgrantees provide reports to them in a timely and accurate manner so that respective grantees' reports will be timely and accurate for the CSP.

A description of how local CSBG programs will perform these initiatives must be included in their local applications to CSP, and through their respective community action plans. Eligible entities must also describe how they will implement their signed assurances with regard to these initiatives.

Lastly, grantees and subgrantees must maintain their eligibility to receive CSBG funds, and must be in compliance with all applicable laws, regulations, requirements, and contractual agreements. This will apply whether the organization is directly receiving CSBG funds from CSP (a grantee or eligible entity), or whether they are involved in a subcontractual agreement with another grantee (a subgrantee, or subcontractor). CSP reserves the right to examine all aspects of CSBG and related operations of grantees and subgrantees at any time to ensure that this is the case.

(State) Review of Local Applications:

Because of the fact that eligible entities' funding applications or proposals are not competitive with each other (other than the "Set-Aside Funds Component"), the approval process by CSP will be a relatively simple one. If the applications are received with the established time limits and they fully comply with the provisions of the CSBG Act and the State Plan, they will be approved by CSP. As has been the case in the past, extensions may be granted for applications if formally requested by prospective grantees.

Applications must address adequately all of the criteria and requirements outlined in the State Plan. However, it is the position of CSP that voluminous applications that contain primarily rhetorical information, and/or "filler" are totally unnecessary. Simplicity, clarity, and common sense should prevail in the preparation of applications.

If initial applications are not satisfactory, prospective grantees will still have an opportunity for corrective action, as set forth by CSP.

Contractual Process:

A standard sponsor contract form (or legal agreement) serves as the basis for the allocation of all CSBG funds. This form and its appropriate attachments, (1) the CSBG State Plan, and (2) the respective grantee application and local plan, constitute a binding contract between CSP and a respective grantee (or eligible entity) once it is approved and signed by officials for both parties, and by the State Attorney General=s Office.

Contracts between the State and its grantees are binding on both parties in all respects. However, grantees are allowed limited flexibility in regard to making minor adjustments in program goals and activities, or making minor adjustments or revisions in program activities without having to seek a formal contract amendment or waiver. Detailed information regarding amendments or waiver is found in the "Amendments/Waivers" Section of this Plan.

The CSBG contracting process occurs annually after the approval of local applications. The same process is used at a later time with the "State Set-Aside Component." Further, any funds that become available through redistribution or reallocation will also utilize the formal CSBG contractual process.

Funding Award Procedures:

CSP will enter into a formal contractual agreement with its grantees as soon as is practical after funding decisions are announced. Once the contract is signed by all parties (including the State Attorney General=s Office) this contract will be binding on both parties, and the fund transaction process (voucher system) will begin.

Contingent upon receipt of CSBG funds from the HHS/OCS, the CSP will provide initial financial support one month in advance for sponsors. Subsequent funding will be provided, based on estimates of funding requirements contained in respective grantee=s financial reports, and other appropriate information and data.

After the initial payment, CSP must have respective grantee=s past monthly financial and performance report before any further payments will be made.

Funds must be expended by the ending date of the contract period agreed upon by the State and the grantee. Funds not expended by the ending date may be carried over and utilized in the next program year in unique circumstances. A formal request to carry over funds to the next program year must be submitted to CSP for approval to do so.

Amendments/Waivers:

Contracts between the State and its grantees will be binding on both parties in all respects. However, grantees will be allowed limited flexibility in regard to making adjustments in program goals and activities. Specifically, if a grantee or subgrantee feels the need to significantly change its local program, a written request must be made to CSP for disposition. As an example, funds that need to be transferred between budget line-items must be approved in writing.

Any advice needed by local grantees or subgrantees as to whether or not its proposed amendments or waivers are "major" or "minor" in nature should be brought to the attention of CSP; who will then advise the respective grantee or subgrantee as to the proper procedure, formal or informal, for approval of the amendment or waiver request.

Appeals/Hearing Process for Clients or Applicants:

Any substantive decision by CSP, its eligible entities or subcontractors which an applicant for program services, or a program client believes to be unfair or unreasonable, and having a major adverse impact upon the applicant or client, may be appealed to CSP by the affected applicant or client. Procedures for such process are included in the CSBG Operations Manual, which is an attachment to this Plan.

Appeals/Hearing Process for Grantees or Subgrantees:

Any substantive decision by CSP which a state grantee or subgrantee believes to be unfair or unreasonable, and having a major impact on its local program may be appealed to CSP by the affected agency or organization. Procedures for such process are included in the CSBG Operations Manual, which is an attachment to this Plan.

If such appeal is of the magnitude of major corrective action, possible sanctions, termination, or reduction of funding, this process will be utilized along with the process outlined in the "Corrective Action/Sanctions/ Termination and Reduction of Funding" Section of this Plan, consistent with federal requirements.

Confidentiality:

Information gathered on people (i.e., applicants and/or clients on either a state level or local-level) will be treated as strictly confidential. Access will be limited strictly to those with legitimate need to administer and operate the CSBG Program; i.e. program staff, CSP staff, and/or other applicable local, state, or Federal Government reviewers, or any public or private sector designee of CSP.

Child Support Services and Referrals:

The new CSBG Act added a provision that requires eligible entities and their subcontractors to:

1. inform custodial parents in single-parent families that participate in programs, activities, or services carried out under the CSBG program about the availability of child support services; and
2. refer eligible parents to the child support offices of the state and local governments.

The key to getting help with a child support case is knowing where to look for it. Offices providing child support services are located in 17 towns and cities in the state's nine judicial districts. The state office in Cheyenne is primarily administrative. Child support payments are processed through the clerk of the district court offices in Wyoming's 23 counties and a single address location in Cheyenne.

Child Support District Offices

Judicial District	Counties Served	Name & Address of Enforcement Office	Telephone Numbers
First	Laramie	Child Support Services 2020 Carey Avenue Suite 501 Cheyenne, Wyoming 82001	307- 635-3365 1-800-742-3092 Fax: 307-635-3347
Second	Albany Carbon	Child Support Services 2020 Grand Avenue Suite 350 Laramie, Wyoming 82070	307-742-5688 1-800-742-3096 Fax: 307-742-5737
Third	Sweetwater	Child Support Services 60 Shoshone Street Green River, Wyoming 82935	307-875-4725 1-800-742-3098 Fax: 307-875-4643
	Lincoln Uinta	Child Support Services 1575 Hwy 150 South, Suite J Evanston, Wyoming 82930	307-789-8187 1-800-482-3422 Fax: 307-789-8189
Fourth	Sheridan	Child Support Authority 224 South Main, 4th Flr East Sheridan, Wyoming 82801	307-672-2599 1-800-565-4502 Fax: 307-672-5991
	Johnson	Child Support Authority 76 North main Street 2nd Flr Buffalo, Wyoming 82834	307-684-9011 Fax: 307-684-9093

Fifth	Big Horn	Child Support Authority 415 West "C" Street Basin, Wyoming 82410	307-568-9329 1-800-871-9165 Fax: 307-568-2971
	Hot Springs	Child Support Authority 415 Arapahoe Thermopolis, Wyoming 82443	307-864-5768 1-800-432-1698 Fax: 307-864-3098
	Park (Cody)	Child Support Authority 1002 Sheridan Avenue Cody, Wyoming 82414	307-527-8840 1-800-565-3224 Fax: 307-527-8844
	Park (Powell)	Child Support Authority 109 West 14th Powell, Wyoming 82435	307-754-8830 1-800-283-8605 Fax: 307-754-1070
	Washakie	Child Support Authority 200 North 7th Street Worland, Wyoming 82401	307-347-8927 1-800-432-1675 Fax: 307-347-6648
Sixth	Campbell	Child Support Authority 405 West Boxelder Suite B6 Gillette, Wyoming 82716	307-687-1501 1-800-360-5220 Fax: 307-864-17398
	Crook	Child Support Authority 309 Cleveland Sundance, Wyoming 82729	307-283-1515 Fax: 307-283-1515 Yes, same phone number

	Weston	Child Support Authority 723 B Washington Blvd. Newcastle, Wyoming 82701	307-746-2311 Fax: 307-746-4796
Seventh	Natrona	Child Support Enforcement 120 West First Casper, Wyoming 82602	307-235-9229 1-800-292-3219 Fax: 307-235-9629
Eighth	Converse Niobrara Platte Goshen	Child Support Services of Wyoming 119 South 3rd P. O. Box 169 Douglas, Wyoming 82633	307-358-0947 1-866-280-3719
Ninth	Fremont Wind River Sublette Teton	Child Support Services of Wyoming 409 Lincoln St., Suite B Lander, Wyoming 82520	307-332-6380 1-800-996-6045
Northern Arapaho		TANF Project Fort Washakie 82514	307-332-5006 Ext 11

Drug Testing:

The new CSBG Act added a provision allowing the State to conduct drug testing on CSBG program participants in programs, activities, or services carried out under the CSBG program for controlled substances. If the State conducts the testing, it must inform participants who test positive for any of such substances about the availability of treatment or rehabilitation services and refer such participants for appropriate treatment or rehabilitation services and/or facilities.

Any funds provided for drug testing is considered to be expended for administrative expenses.

The term "controlled substance" has the meaning given the term in section 102 of the Controlled Substances Act (21 U.S.C. 802).

IMPLEMENTATION OF/COMPLIANCE WITH FEDERAL ASSURANCES

Assurance 1 - Program Purposes/P.L. 105-285, 676(b)(1)(A)(i-viii)(B)(i-ii)(C)

- (1) an assurance that funds made available through the grant or allotment will be used:
 - (A) to (SUPPORT) activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable the families and individuals to:
 - (i) (SELF-SUFFICIENCY) remove obstacles and solve problems that block the achievement of self-sufficiency(including self-sufficiency for families and individuals who are attempting to transition off a state program carried out under part A of Title IV of the Social Security Act);
 - (ii) (EMPLOYMENT) secure and retain meaningful employment;
 - (iii) (EDUCATION) attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;
 - (iv) (INCOME MANAGEMENT) make better use of available income;
 - (v) (ADEQUATE HOUSING) obtain and maintain adequate housing and a suitable living environment;
 - (vi) (EMERGENCY ASSISTANCE) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (vii) (GREATER PARTICIPATION) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

- (B) (YOUTH DEVELOPMENT) address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and
- (C) (COORDINATION) make more effective use of, and to coordinate with, other programs (including state welfare reform efforts).

Assurance 1 Compliance: All recipients of CSBG funds submitted highly detailed work plans, budgets, and other appropriate information detailing the programs, projects, services, and activities to be conducted using CSBG funds. Such local plans were approved by the grantee(s) board of directors prior to submission to CSP. They were then reviewed and approved by CSP program staff prior to submission as part of the CSBG contract and payment system. In those cases where corrective action was necessary, no local applications/work plans were approved by CSP until such corrective action was provided. Program implementation will be monitored regularly.

Assurance 2 - State Use of Federal Discretionary Funds/P.O. 105-285, 676(b)(2)

- (2) a description of how the State intends to use discretionary funds made available from the remainder of the grant or allotment including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the CSBG.

Assurance 2 Compliance: All decisions have not yet been made as to the specific programs and projects under the discretionary funds component. Ultimately, funds will be used for (a) training and technical assistance; (b) coordinating state-operated programs, as well as local programs; (c) support of state-wide coordination among eligible entities and subcontractors; (d) support of individual development account and other asset-building programs; (e) analyzing distribution of State CSBG funds to determine if funds have gone to areas with the greatest need; (f) support of establishment of State Charity Tax Credit Program; (g) joint projects with the Wyoming Department of Family Services to assist those people in transition from welfare to self-sufficiency; (h) the development of a CSBG IT Data collection system for eligible entities; and (i) support of other activities that are consistent with the

intent and purposes of the CSBG. It is expected that a substantial amount of these funds will be used for training to grantee boards of directors, orientation of grantee executive directors, and fiscal officers, to support the activities of state-wide CSBG work groups, and to provide appropriate resource documents to grantee(s) boards and staffs.

Assurance 3 - Use of Grantee Information/P.L. 105-285, 676(b)(3)

- (3) information provided by eligible entities in the state, containing:
 - (A) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 676(C)(a) of the Act, targeted to low-income individuals and families in communities within the state;
 - (B) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
 - (C) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and
 - (D) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the CSBG, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting.

Assurance 3 Compliance: All such information provided by grantees and subcontractors is used in developing the State CSBG Management Plan.

Assurance 4 - Nutrition Services/P.L. 105-285, 676(b)(4)

- (4) an assurance that eligible entities in the state will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.

Assurance 4 Compliance: The direct provision of services and activities will be implemented by grantees. Nutritional services and activities will be a significant portion of the CSBG expenditures, as has been the case in recent years (see executive summary of previous year=s annual report). Food/nutrition activities under the U.S. Housing and Urban Development (HUD) Emergency Shelter Grant (ESG) Program will be used to supplement CSBG activities.

Assurance 5 - State coordination/Linkages/P.L. 105-285, 676(b)(5)

- (5) an assurance that the State and the eligible entities in the state will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the state and in communities with entities providing activities through state-wide and local workforce investment systems under the Workforce Investment Act of 1998;

Assurance 5 Compliance: CSP will collaborate all appropriate and pertinent parties to provide training, information, and technical assistance to grantees. CSP will continue to work with all relevant state and local agencies, both public and private, to ensure coordination of services, and to avoid duplication.

Assurance 6 - Coordination, Energy Programs/P.L. 105-285, 676(b)(6)

- (6) an assurance that the State will ensure coordination between anti-poverty programs in each community in the state, and ensure, where appropriate, that emergency energy crisis intervention programs under Title XXVI (relating to low-income home energy assistance) are conducted in such communities;

Assurance 6 Compliance: CSP will provide state and local agencies, both public and private sectors with copies of the State CSBG Management Plan and will solicit their comments. CSP will work with CSBG grantees, such as those who administer the low-income energy assistance program, to ensure coordination of services.

Assurance 7 - Cooperation with Federal Investigations/P.L 105-285, 676(b)(7)

- (7) an assurance that the State will permit and cooperate with federal investigations undertaken in accordance with section 687D of the Act;

Assurance 7 Compliance: Full cooperation in the event of an investigation is assured. All requested documents, books, and records will be made available. Appropriate staff support will be provided.

Assurance 8 - Termination of Funding/P.L. 105-285, 676(b)(8)

- (8) an assurance that any eligible entity in the state that received funding in the previous fiscal year through the CSBG will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678(C)(b) of the Act.

Assurance 8 Compliance: CSP has processes, both developed in FFY 82 for (1) Client or Applicant Appeal Process, and (2) Grantee/Subgrantee Appeal Process. The Grantee/ Subgrantee Appeal Process incorporates the language in P.L. 105-285 with regard to termination of funding to an eligible entity. The State CSBG Plan identifies four areas of default of obligations as follows:

The CSP may terminate or suspend an agreement (contract) for default by a contractor... Contractor shall be considered in default of its obligations under an agreement if:

- (1) Contractor persistently disregards laws, rules, ordinances, regulations, or orders of any public authority having jurisdiction;
- (2) Performance of the work fails to substantially conform to the requirements of the contract documents;
- (3) Contractor abandons or refuses to proceed with any or all of the work; or
- (4) Contractor performs work...in which officers or employees of the contractor have a direct or indirect interest that would result in a conflict of interest.

Should default leading to suspension or termination of funds occur, the hearing procedure mentioned above would be implemented. Prior to initiating the termination process, CSP would provide the eligible entity or subcontractor with opportunities to correct the situation(s). Technical assistance and support would be provided and OCS/HHS would be informed of the issue(s) and provided with copies of all correspondence, including the grantee improvement plan and the CSP support plan.

Assurance 9 - State Agency Collaboration/P.L. 105-285, 676(b)(9)

- (9) an assurance that the State and eligible entities in the state will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of communities and members of the groups served by the state, including religious organizations, charitable groups, and community organizations.

Assurance 9 Compliance: CSBG is administered in partnership with a variety of programs, including the Emergency Shelter Grants (ESG) Program. At the state and local level, the CSBG works in close collaboration with virtually all of the state=s human services programs, both public and private

sector. These represent boards of directors, public officials, members of law enforcement, clergy, banks, neighborhood groups, and other individuals and organizations as appropriate.

Assurance 10 - Board Representation-Petition/P.L. 105-285, 676(b)(10)

- (10) an assurance that the State will require each eligible entity in the state to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.

Assurance 10 Compliance: All grantees are required to include language in their bylaws and board policies to allow groups and individuals to petition for representation on the boards of directors. This is required by CSP as part of grantees' local funding applications. This process will be monitored. Further, CSP will extend invitations to the partners listed in this assurance to participate in local training conducted for grantee boards of directors.

Assurance 11 - Community Action Plans/P.L. 105-285, 676(b)(11)

- (11) an assurance that the State will secure from eligible entity in the state, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State Plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.

Assurance 11 Compliance: The CSBG annual funding application package serves as the essential basis of the community action plan. All local community action plans, including respective local needs assessments are available for inspection or for submission, as required. All community action plans, at a minimum, will include:

- (a) a community needs assessment (including food needs);
- (b) a description of the service delivery system targeted to low-income individuals and families in the service area;
- (c) a description of how linkages will be developed to fill identified gaps in service through information, referral, case management, and follow-up consultations;
- (d) a description of how funding under the CSBG Act will be coordinated with other public and private resources; and
- (e) a description of outcome measures to be used to monitor success promoting self-sufficiency, family stability, and community revitalization.

Assurance 12 - Participation in ROMA/P.L. 105-285, 676(b)(12)

- (12) an assurance that the State and all eligible entities in the state will, not later than Fiscal Year 2001, participate in the Results-Oriented Management and Accountability (ROMA) system, another performance measure-system for which the Secretary facilitated development pursuant to Section 678(E)(b), or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.

Assurance 12 Compliance: The State of Wyoming began participation in ROMA in FFY 99. Wyoming has adopted all six CSBG National Goals and contractors are providing data as required for National Performance Indicator forms. Grantee work plans, budgets, and monthly reports are all centered on these goals and outcome measures. Wyoming=s ROMA system is, essentially, a combination of three components closely blended together to achieve the *WyoROMA* system: (1) the traditional CSBG planning and reporting system; (2) the Wyoming Governor=s Strategic Planning management system; and (3) the CSBG Results-Oriented Management and Accountability (ROMA) system. *WyoROMA* was approved by HHS beginning in FY 99 and is still currently being used in the FFY 2010 program. Detailed information regarding *WyoROMA* is included in the *WyoROMA* Section of this State Plan. Because Wyoming=s system incorporates strategic planning with the reporting requirements of ROMA, it is the Abest of three worlds@ and works very well for Wyoming. As an aside, local eligible entities and subcontractors were initially (and understandably) skeptical about it. Ultimately, there has been universal and widespread praise for the system, as it has been apparent that local programs realize the benefits in terms of good planning and information it provides to them, as well as to the state and Federal Government. CSP will continue to provide training and/or technical assistance to grantees and subcontractors to bring all to a higher level of performance through *WyoROMA*.

Assurance 13 - Program Information Description/P.L. 105-285, 676(b)(13)

- (13) information describing how the State will carry out the assurances described in this subsection relating to assurances.

Assurance 13 Compliance: This State Plan includes detailed descriptions of the activities of the State, its grantees, and subcontractors, documenting how the State will carry out all required assurances.

FISCAL CONTROLS AND MONITORING

Wyoming CSBG Program Monitoring:

Financial and Performance Reporting:

The reporting for local monthly financial and performance reporting are completed on the cmReporter database, which was developed by CMA Technologies in 2008 specifically for Wyoming to accommodate the federal requirements.

On the "Performance" side, as well as the forms used in the past that reflected clients served by service category by month, and accumulative-to-date; and the *WyoROMA* portion which reflects the six national goals, there is now a requirement for additional demographic information which will be a part of the "Performance" portion of the monthly and annual reports. Essentially, these forms will reflect demographic client characteristics (i.e., gender, age, race, education, family structure, income and sources, housing status, and other).

Financial and Performance reporting forms (to be submitted monthly) and instructions, as well as, National Performance Indicator forms (to be submitted annually) are located in the "CSBG Operations Manual" portion of this document (Ivory pages).

Compliance with Reporting Requirements:

As part of local grantees' (eligible entities) applications for funding, it is required that each application address specifically how their local fiscal and program performance reporting system will function (particularly with regard to subcontractor service delivery organizations) and how that relates to the composite eligible entity monthly reports required by WDH/CSP.

Detailed explanations of CSP=s fiscal and performance reporting forms along with the National Performance Indicator Forms, are included in the CSBG Operations Manual which is an attachment to this Plan (Ivory pages).

Monitoring/Performance:

The state lead agency for conducting reviews of eligible entities (including subcontractors, or service providers) is CSP. The CSP may involve people from other state agencies if the need arises, as appropriate.

The CSP will comply with the federal requirements regarding reviews; however, the CSP may perform on-site reviews on a more frequent basis if individual program circumstances warrant "special" reviews.

The revised CSBG Act now requires the State to monitor eligible entities and their subcontractors (service providers) in order to determine whether they meet the performance goals, administrative standards, financial management requirements, and other federal and state requirements. The State must, at a minimum, conduct:

1. a full on-site review of each eligible entity will be conducted at least once during a three (3) year period;
2. a full on-site review of each newly designated eligible entity immediately after the completion of the first year in which such entity receives funds through the CSBG program;
3. follow-up reviews, including prompt return visits to eligible entities and their subcontractors, that fail to meet the goals, standards, and requirements established by the CSBG Act and the State Plan (to be conducted as necessary); and
4. other reviews as appropriate, including reviews of eligible entities and their subcontractors that have had other federal, state or local grants terminated for cause (to be conducted as necessary).

Further, even if an entity's grant has not been terminated, but if it appears that there is significant management, programmatic, or financial problems, the CSP may perform a "special" review, as appropriate.

In addition, as in the prior versions of the Act, the HHS/OCS must conduct evaluations and investigations of the use of CSBG funds each year. HHS must submit to the State a report of the evaluation and recommendations for improvements, as necessary. The State must then submit to HHS a plan of action in response to the recommendations, as appropriate. The evaluation results must then be included in the annual report by HHS to the U.S. Congress.

The following is a schedule of on-site reviews that have been conducted or are scheduled to be conducted:

CSBG eligible entities monitored in calendar year 2008:

Lincoln County – NOWCAP
 Yellowstone Country Assistance Network
 Sublette County – NOWCAP
 Sweetwater County Tripartite Board
 Human Services Tripartite Board of Uinta County

CSBG eligible entities scheduled to be monitored in calendar year 2009:

CSBG Board of Directors of Albany County
 Campbell County CARE Board
 Carbon County Community Action Committee
 Converse County Human Resources Council
 Fremont County Action Committee
 Community Action of Laramie County
 Community Action Partnership of Natrona County
 Northern Arapaho Human Services Commission
 Sheridan County Tripartite Board

CSBG eligible entities scheduled to be monitored in calendar year 2010:

Crook County Council of County Services
Foster Grandparents Program – NOWCAP
Goshen County – NOWCAP
Hot Springs County – NOWCAP
Community Resource Center of Johnson County
Niobrara County – NOWCAP
Platte County Tripartite Board
Teton County Tripartite Board
Washakie and Big Horn Counties Tripartite Board
Weston County Action Committee

In addition to provision of routine or requested training and technical assistance, monitoring activities include (but are not limited to) the following:

1. verification of grantee contract compliance;
2. observation of grantee service provision and types of assistance provided;
3. provision of training and technical assistance in direct services and administrative areas by the eligible entity for its staff persons and for its subcontractors;
4. attendance at regularly-scheduled governing board meetings, to observe board functioning and operation to verify consistency with the provisions of proper Tripartite Board practices and procedures;
5. review of governing board files to verify board composition and to review minutes for verification of proper board practices;
6. review of client and related program files to ensure appropriate paper trails, with emphasis on case management;
7. one-on-one contact with eligible entities and subcontractors (to the extent practicable) staff persons for the purpose of soliciting input with regard to program performance and other areas;
8. one-on-one contact with current program clients and/or ex-clients (to the extent practicable) for the purpose of soliciting input as to opinions about program effectiveness, and related areas;
9. confirmation of each eligible entity=s (and subcontractor=s) last audit, and the period covered;
10. conversations with staff members of eligible entities and subcontractors for the purpose of ascertaining what kinds of training and technical assistance is needed;
11. on-going (meaning daily) contact with eligible entities and subcontractors by telephone, in writing, or at information-sharing meetings;

12. collection of data and information from eligible entities and subcontractors (i.e., monthly performance and fiscal reports) in addition to other information either requested or voluntarily submitted to CSP; and
13. review of annual grant applications to assure compliance with federal and state assurances, and all applicable requirements of the CSBG Act.

Monitoring/Fiscal:

The fiscal monitoring system is essentially the same as the "Performance Monitoring" system. It would not be remiss to address only one and not the other inasmuch as they are totally interrelated. Information from both areas is needed in order to assess program compliance with requirements and standards.

Eligible entities' and subcontractors' monthly reports are essentially in two categories, (1) program performance, and (2) fiscal, or financially-oriented. They are submitted as a package around the 10th of each month, with data and information for the previous month. Both fiscal and performance reports also contain "year-to-date" data, statistics and information as well as the previous month's data.

Fiscal report and data are also reviewed and controlled by the Wyoming Department of Health (WDH) Budget and Fiscal Unit, in addition to CSP. The State Auditor=s Office also has the responsibility of overseeing all state fiscal processes, be they State Government, or public funds that are allocated to state contractors.

Evaluation:

The evaluation function will be conducted essentially like the monitoring process except that formal written evaluation of programs will be established at designated times. They will be conducted annually, at a minimum.

Basically, the state level evaluation system will be one of measuring actual outcomes and performance measurements (or targets) against planned outcomes of goals and objectives, and measurements, impact of programs on the community, compliance with all applicable requirements, and other appropriate measurements.

The key to the evaluation process will be through its correlation with *WyoROMA* practices and systems.

Corrective Action/Sanctions/Termination and Reduction of Funding:

The new CSBG Act created an entirely new process for identification and correction of an eligible entity=s deficiencies. This process will be followed before initiation of funding termination or reduction proceedings that are based on non-compliance with State requirements, including performance objectives, agreements (contracts) or the State Plan. This process should be of

substantial help in correcting problems before they become so severe as to cause a loss of funding, or worse.

The trigger for the process is a final decision by CSP, based on a review conducted as described in the preceding paragraph that the entity fails to:

- S comply with the terms of an agreement (contract) or the State Plan;
- S provide CSBG services; or
- S meet the State=s appropriate standards, goals, or other requirements, including performance objectives.

If such is the case, CSP will:

- S inform the entity (or entities, as appropriate) of the deficiency or deficiencies to be corrected;
- S require the entity to correct the deficiency;
- S offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to HHS/OCS a report describing the training and technical assistance offered; or if CSP determines that such training and technical assistance are not appropriate, it will prepare and submit to HHS/OCS a report stating the reasons for the determination.

CSP may, at its discretion, taking into account the seriousness of the deficiency and the time reasonably required to correct it, allow the entity or entities to develop and implement, within sixty (60) days of being informed of the deficiency, a plan to correct the deficiency within a reasonable period of time.

CSP will, not later than thirty (30) days after receiving from an eligible entity a proposed quality improvement plan (corrective action plan), either approve such proposed plan or specify the reasons why the proposed plan cannot be approved.

If the entity does not correct the deficiency, CSP will, after providing adequate notice and an opportunity for a hearing (through the CSBG Hearing/ Appeal Process of the State Plan), initiate proceedings to terminate the designation of, or reduce the funding, as appropriate.

Before terminating or reducing the funding, CSP must determine that Acause@ exists and, if the entity so requests, submit the decision to HHS/OCS for review. The HHS/OCS must complete the review within ninety (90) days of receiving necessary materials from the State; otherwise the State=s determination becomes final. For purposes of both funding reductions and termination, Acause@ exists where an entity has not complied with a State requirement or the terms of an agreement (contract) or the State Plan. Official definition of Acause@ follows.

For purposes of making a determination in accordance with the CSBG Act with respect to:

- (1) a funding reduction, the term Acause@ includes--
 - (A) a state-wide redistribution of funds provided through the CSBG to respond to-

- (i) the results of the most recently available census or other appropriate data;
 - (ii) the designation of a new eligible entity; or
 - (iii) severe economic dislocation; or
- (B) the failure of an eligible entity to comply with the terms of an agreement or the State Plan, or to meet a state requirement, as described in section 678C(a) of the CSBG Act (ACorrective Action; Termination and Reduction of Funding@); and
- (2) a termination, the term Acause@ includes the failure of an eligible entity to comply with the terms of an agreement or the State Plan, or to meet a State requirement, as also described in section 678C(a) of the CSBG Act (ACorrective Action; Termination and Reduction of Funding@).

If CSP terminates or reduces funding without providing the required hearing or HHS/OCS review, HHS/OCS may directly fund the eligible entity until the violation is corrected if appropriate. If that happens, the next year=s allocation to the State will be reduced by an amount equal to the funds provided to the eligible entity.

CSP ensures compliance with this assurance through consultation, advice, and direction from the State Assistant Attorney General who is designated as the liaison with the CSBG through the Office of the Attorneys General. In addition, the CSP will utilize its CSBG AAppeal/Hearing Process@ commensurate with the requirements of Section 678(c) of the CSBG Act.

Fiscal Controls, Audits, and Withholding:

The new CSBG Act=s provisions concerning fiscal control, procedures, audits, inspections, and withholding are substantially the same as before, but have been reorganized into a single section.

The State is required to:

1. establish fiscal control and fund accounting procedures necessary to assure the proper disbursement of and accounting for federal funds paid to the State, including procedures for monitoring the funds provided to the State;
2. ensure that cost and accounting standards of the Office of Management and the Budget (OMB) apply to CSBG fund recipients (both eligible entities/contractors, and subcontractors);
3. prepare an audit at least yearly, which is an audit of the expenditures of the State of amounts received under the CSBG Act, and amounts transferred to carry out the purposes of the CSBG Act; and

4. make appropriate books, documents, papers, and records available to the HHS/OCS and the Comptroller General of the U.S., or any of their duly authorized representatives, for examination, copying, or mechanical reproduction on or off the premises of the appropriate entity upon a reasonable request for the items.

Each audit required shall be conducted by an entity independent of any agency administering activities or services carried out under the CSBG Act and shall be conducted in accordance with generally accepted accounting principles. Audits shall be conducted in the manner and to the extent provided in chapter 75 of title 31, U.S. Code (commonly known as the "Single Audit Act Amendments of 1996").

Within thirty (30) days after the completion of each such audit in the state, the State shall submit a copy of such audit to any eligible entity that was the subject of the audit at no charge, to the Wyoming State Legislature, and the HHS/OCS.

The State shall repay to the Federal Government amounts found not to have been expended in accordance with the CSBG Act or the HHS/OCS may offset such amounts against any other amount to which the State is or may become entitled under the CSBG Act.

The HHS/OCS may withhold funds from the State if, after providing adequate notice and an opportunity for a hearing conducted in the state, it determines that the State has not used its CSBG funds in accordance with the CSBG Act provisions, including the State=s assurances. This standard is lower than the previous one, which permitted withholding only where the State=s utilization of funds was not substantially in accordance with the CSBG Act. It may, therefore, now be easier for HHS/OCS to withhold funds from the State.

The HHS/OCS must respond in an expeditious and speedy manner to complaints of a substantial or serious nature that the State has failed to use funds in accordance with the provisions of the CSBG Act, including the assurances provided by the State. A complaint of a failure to meet any one of the assurances provided by the State is considered a serious complaint.

If the HHS/OCS determines that there is a pattern of complaints of failures described in the previous paragraph, they shall conduct an investigation of the use of funds received under the CSBG Act in order to ensure compliance with the provisions of the Act.

The State will permit and cooperate with federal investigations undertaken in accordance with 678D of the Act (Assurance 676(b)(7)). In the event of an investigation, the State of Wyoming will make available to federal investigators all required records and documents, as required by State-local (eligible entities and subcontractors) as appropriate.

WDH has chosen to include the audit of all of its block grants, including the CSBG, as part of its annual Department wide audit. With the issuance of Circular A-133, OMB Circular A-128, "Audits of State and Local Governments", issued April 1985 was rescinded and, as a result, Department audits will be covered by the revision to OMB Circular A-133, "Audits of States, Local Governments, and Nonprofit Organizations."

The following audit standards apply to all funds flowed through the WDH to grantees (eligible entities) and subcontractors.

Audit Standards

Service providers who receive \$500,000 or more in federal assistance annually must comply with the requirements set forth in OMB Circular A-133, regardless of the amount of state assistance also received. The ceiling of \$500,000 means federal funds from all sources, not just the CSBG.

Service providers who receive \$500,000 or more in state assistance but less than \$500,000 in federal assistance annually must have an audit for financial purposes in accordance with Government Auditing Standards (commonly known as "The Yellow Book").

Federal funds cannot be used to pay the costs of any audit wherein the total federal assistance received is less than \$500,000. For the required audit of state assistance in excess of \$100,000, State funds should be used to pay for such audit.

Any service provider who annually receives less than \$100,000 in state assistance and less than \$500,000 in federal assistance is exempt from these audit requirements.

Copies of required audits shall be submitted to the Wyoming Department of Audit, and the appropriate granting authority (i.e., the Wyoming Department of Health).

ACCOUNTABILITY AND REPORTING REQUIREMENTS

Results Oriented Management and Accountability Federal Mandate:

This federal assurance mandates that the State and all eligible entities in the state will, not later than Fiscal Year 2001, participate in the Results Oriented Management and Accountability (ROMA) System or another performance measure system for which the Secretary of the HHS facilitated development pursuant to Section 678E(b) of the Act.

Outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization are included in the AROMA/WyoROMA@ Section of this Plan. Such measures will measure performance toward meeting the national goals of the CSBG:

Goal 1: Low-income people become more self-sufficient (self sufficiency)

Goal 2: The conditions in which low-income people live are improved (community revitalization)

Goal 3: Low-income people own a stake in their community

Goal 4: Partnerships among supporters and providers of services to low-income people are achieved

Goal 5: Agencies increase their capacity to achieve results

Goal 6: Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems (family stability)

CSP and its eligible entities began using ROMA in its FFY 98 program on a limited basis and, in the FFY 10 Program, the CSP and all eligible entities are participating in *WyoROMA*. CSP developed this system as a management tool for all CSBG participants, both eligible entities/contractors, and subcontractors. Much detail is found in the State Plan and the CSBG Operations Manual which accompanies the State Plan about the *WyoROMA* system. In short, it is a performance measurement system that is used by the State and its eligible entities to measure their performance in carrying out the CSBG requirements and in achieving the goals of their community action plans. The State has provided substantial training and technical assistance in ROMA issues to eligible entities during FFY 1998 through 2004, and plans to continue to do so in the FFY 2010 program. (See Operations Manual for Agency Level Forms).

All eligible entities and subcontractors are required by the State Plan to submit their applications for funding and their monthly progress reports in the *WyoROMA* format.

ROMA:

Through the Results-Oriented Management and Accountability (ROMA) System presented by the U.S. Department of Health and Human Services (HHS), Office of Community Services (OCS); the following definitions were developed by The Rensselaerville Institute:

Outcome Statement: An inspiring statement that defines the broad end state sought in customer terms (i.e., self-sufficiency, graduates and gets a job with career potential, etc.)

Performance Target: Defines success for your program in terms of what the customer will actually achieve (get & keep employment for 1 year).

Milestones: Specifies actions, the steps, the small changes along the way most customers will need to take to reach performance target.

Generally speaking, the Statement includes the word All@ and the Performance Target identifies what portion of that total will be achieved.

ROMA National Goals and Measures:

In addition, the National CSBG Task Force on Monitoring and Assessment has proposed six (6) National Goals, each with attendant ROMA Outcome measures. While the State is required to report on its activities and services using these goals, the goals are flexible enough to allow local agencies to pursue objectives that meet their unique local conditions.

Those six goals are:

SELF-SUFFICIENCY

GOAL 1. Low-income people become more self-sufficient (*Client and Family*);

COMMUNITY REVITALIZATION

GOAL 2. The conditions in which low-income people live are improved (*Community*);

GOAL 3. Low-income people own a stake in their community (*Community*);

GOAL 4. Partnerships among supporters and providers of services to low-income people are achieved (*Agency*);

GOAL 5. Agencies increase their capacity to achieve results (*Agency*); and

FAMILY STABILITY

GOAL 6. Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems (*Client and Family*).

Planning Process:

Since the Federal Fiscal Year 1999 Work Plan, providers of services utilizing federal CSBG funding have been reporting accomplishments through the Results-Oriented Management and Accountability (ROMA) planning process developed in accordance with the Government Performance and Results Act of 1993 (GPRA), as modified by the *WyoROMA* system developed by Wyoming Community Services Programs (CSP). Several programs sent applications that included ROMA criteria in FFY 1998, and all programs included ROMA criteria in FFY 1999 and continue reporting by *WyoROMA* through the present. This system allows participants in the Wyoming CSBG Program to plan, conduct, evaluate, and report on activities in a fashion that will meet the requirements of both strategic planning and federal ROMA.

Strategic Planning:

The State of Wyoming has developed, and utilizes as its primary management tool, a strategic planning process as authorized by Wyoming Statute (WS 28-1-115). Within that strategic plan, the Department of Health has established, through its 1999-2002 Strategic Plan, a Mission to be responsive to the health needs of the public, and to use the resources entrusted to us wisely, and to be accountable for our actions; and a Strategic Goal to promote, protect, and enhance the health and well-being of all Wyoming citizens.

As an entity of the Department of Health, the Community Services Programs was assigned a strategy to AProvide a program to identify and help eliminate poverty-related problems by using available local, state, federal, and private resources;@ toward meeting a departmental objective to Aestablish, maintain and promote the development of a comprehensive range of quality services and supports throughout Wyoming which stress independence, dignity and security.@

As part of the Strategic Planning Process, and to assist local participants in developing Goals, Objectives, Strategies, Outcomes, and Outputs, the Community Services Programs have developed a set of definitions, which follow:

Goals: A goal is the general end toward which efforts are directed, and addresses the primary issue or problem to be solved. It is both qualitative and quantifiable, but need not be quantified (measurable).

Objectives: An objective is a clear target for specific action. It is linked directly to the goal and is quantified (measurable) as a time-based statement of intent, emphasizing the results to be achieved by that action at the end of a specific time.

Results: A result is an indicator of the actual impact or effect of an action on a stated condition or problem. It is a tool to assess the effectiveness of an action and/or the public benefit to be derived from that action. It is typically expressed as a percentage, rate, or ratio.

Measures: A measure is a tool for counting the services and good produced through an action. The number of people receiving a service and the number of services delivered are often used as measures.

Strategies: A Strategy is a method for achieving goals and objectives. It is used to demonstrate the process for transforming activities into measures (achievements) and ultimately into priorities (results) that cause the objectives, and ultimately the goals, of a program to be accomplished. It reflects cost/benefits and best use of financial and other resources, or the chronology of activities.

Generally speaking, for purposes of consistency, goal and objective statements begin with the word ATo@. Every program must have at least one goal and one objective, but may have more than one or may have multiple objectives that address a single goal.

WyoROMA:

The Wyoming Community Services Programs has developed, and will utilize as a management tool for all CSBG participants, a system that coordinates the components of both the Wyoming Strategic Plan and the CSBG ROMA. Using that system, local participants of the Wyoming CSBG Program will report in a manner compatible to both designs and that can be reported out to both the executive and legislative branch of Wyoming state government in Strategic Planning terms; and to the federal CSBG in ROMA terms. That management system is known as WyoROMA.

For FFY 2010, the Wyoming Community Services Programs have set the following as evaluation units for the State Strategic Plan:

- Goal:** To make a measurable impact on poverty by using all available local, state, private and federal resources to provide services and activities to remove obstacles and solve problems, thereby enabling low-income families and individuals to become self-sufficient.
- Objective:** That 20% of eligible clients served by local CSBG-funded programs will be moved toward self-sufficiency.
- Results:** To provide guidance, funding assistance, and oversight to local communities who have the ability to offer services to the state=s low-income population in a cost-beneficial manner.
- Measures:** Outputs for measuring the achievement of Wyoming=s CSBG Program include the following:
- 600 low-income persons will be provided with employment and/or training-related assistance;
 - 1,750 low-income persons will be provided with education-related assistance;
 - 1,500 low-income persons will be provided non-emergency housing-related assistance;
 - 1,500 low-income persons will be provided assistance in dealing with (a) better utilization of available income, (b) the removal of obstacles or barriers to self-sufficiency attainment, (c) the achievement of greater participation in community affairs, and (d) more effective utilization of other assistance programs;
 - 23,000 low-income persons will be provided with emergency assistance;
 - 7,000 low-income persons will be provided non-emergency food/nutrition assistance; and
 - 9,000 low-income persons will be provided assistance through improved coordination and linkages between public and private agencies and through the encouragement of better utilization of the private sector of local communities.
- Strategy:** To provide guidance, funding assistance, and oversight to local communities who have the ability to offer services to the State=s low-income population in a cost-beneficial manner.

Because the activities that will cause impact against state-wide CSBG goals, objectives, and performance targets are conducted within local communities under the auspices of local governments; success of the program depends on a close working relationship between community personnel and the Wyoming Community Services Programs. Fortunately, this necessary cooperation exists as a result of several years of conducting CSBG activities in this manner.

Because a successful management system must be dynamic (that is, it must be flexible enough to allow for internal changes and modifications without damage to the entire system), it is essential that oversight agencies recognize the importance of local control of community programs. Wyoming has long been an advocate of problem solving through coordinative efforts of state and local entities; and our sparse population allows a close working relationship with service providers and decision makers within local communities.

General direction is provided by the Wyoming Community Services Programs to guide local communities in regard to fiscal accountability, performance efficiency, and program effectiveness. Within those guidelines, the service providers carry both authority and responsibility for fiscal and performance results. By definition (at its most basic level) accountability answers the question, "Did we do the job right?"; efficiency answers "Did we do the job well?"; and effectiveness answers "Did we do the right job?"

Within that concept of accountability, efficiency, and effectiveness; decisions made and actions taken by the state relative to services provided through the use of CSBG funds must reflect the following:

- Both targeted and non-targeted community residents will be extensively involved in all major program decisions;
- Use of funds must assure that neither sponsors nor participants are dependent on long-term availability of those funds;
- Funds will be directed toward problem solving and capacity building within local communities, focusing on both target and non-target populations;
- Current and prospective program sponsors will be provided the necessary materials, training, and guidance for proper utilization of funds;
- Program activities will complement and be coordinated among Wyoming Indian and non-Indian organizations;
- No major amendments will be made to the CSBG State Plan without prior consultation by the State with current and prospective program sponsors;
- State policies relating to the expenditure of CSBG funds will be limited to those that are essential to meet the requirements of the Act and the State Plan or to ensure that proper management standards are met;
- No major CSBG-related policy decisions will be made by the State without consulting with local governments, interested citizens, and other eligible entities and appropriate persons and organizations; all of whom will be provided opportunity for review of and comment on pertinent documents and materials;
- CSBG-funded activities will be state-wide in nature with funding made available to all geographic areas of Wyoming based on poverty factors and need for services in each area (See "Fund Allocation" tables at the end of this section);
- CSBG activities will be determined by local authority, providing that those activities are completely within the intent of the Act;

- Fiscal and program activities conducted within participating communities will meet the highest practical quality standards; and
- All CSBG-funded activities will be consistent in all aspects with the provisions and the intent of the Act, the State Plan, and local Work Plans approved by the State.

Annual Report:

Consistent with the requirements of section 678E(a)(2) of the Act, CSP will prepare and submit to HHS/OCS an annual report on the measured performance of the State and its eligible entities and subcontractors. The report will address Congressional reporting requirements, and will include, at a minimum, information that is pertinent and comprehensive, and which describes in detail CSBG activities and services as well as addresses outcomes, which measure how CSBG funds were used to promote self-sufficiency, family stability, and community revitalization.

The HHS/OCS will prepare yearly, either directly or by grant or contract, a report for submission to Congress (Committee on Education and the Workforce of the House of Representatives and the Committee on Labor and Human Resources of the Senate). The report will include summaries of both the planned and actual uses of CSBG grants to the State, with a breakdown of funds actually spent on administrative costs and on direct delivery of local services by eligible entities and subcontractors (as applicable), and a comparison of planned versus actual uses. The report must also contain information on the number of entities eligible for CSBG funds, the number of low income people served, and other demographic data, and a summary of the State=s eligible entity and subcontractor performance results.

The State of Wyoming=s annual report will contain:

- a report on the measured performance of the State, its eligible entities, and subcontractors;
- an accounting of the expenditure of CSBG funds, including those funds spent on administrative costs by the State, its eligible entities, and subcontractors;
- an accounting of funds spent by the eligible entities on the direct delivery of local services;
- information on the number and characteristics of CSBG clients;
- a summary of training and technical assistance offered by the State to eligible entities to correct deficiencies;
- summaries of the planned and actual uses of CSBG funds. Although this is not required by either the prior or new CSBG Act, HHS/OCS will require the State to include this information in its annual report since HHS/OCS is now required to include such information in its report to Congress.

Prior Year Review:

Wyoming's FFY 2009 CSBG Program is due to end by September 30, 2009. The following is a six-page executive summary of Wyoming=s FFY 2008 CSBG Program which ended September 30, 2008.

An executive summary of the state=s FFY 2009 Program, which ends September 30, 2009, will follow the same format and be submitted under separate cover.

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Category	Expended
FFY 2008 Funds; Local Governments/Eligible Entities	\$2,994,107.12
FFY 2006 Funds Carried Over; Expended in FFY2008	\$24,498.12
FFY 2008 "Federal 5% Restricted Funds/Statewide Activities (See following Page for project Descriptions)"	\$107,200.66
Sub-total Program Expenditures	\$3,125,805.90
State level Administration:	\$144,407.76
Operating Costs, Community Services Programs/ Indirect Costs, Department of Health/ Indirect Costs, Department of Administration and Information	
<u>Total Expenditures</u>	<u>\$3,270,213.66</u>
FFY 2008 Funds Unexpended; Carried Over to FY 2009	\$60,511.46

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Expenditures of Statewide 5% Funds Per Section 675 (C) of Act

<u>State Grantee</u>	<u>Amount</u>	<u>Purpose</u>
Northern Arapaho	\$12,500.00	Board Training
Northern Arapaho	\$ 9,500.00	Community Participation
Fremont County Assn of Governments	\$ 1,500.00	Administration
Laramie County Community Action	\$ 6,970.24	Training and Technical Assistance
Natrona County Community Action	\$ 5,503.42	Conferences/Training
NOWCAP Community Development Corp.	\$ 5,000.00	Loans
Wyoming Community Action Partnership	\$ 3,750.00	Conference/Training
Cost Management Associates, Inc.	\$37,074.00	cmTools/cmReporter
Community Services Programs	\$25,403.00	Statewide Training and Assistance
	<u>\$107,200.66</u>	

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National Goals:	Funds Expended:*	% of Total:	People Assisted:*	% of Total:
Self-sufficiency:	\$621,340.60	19%	19,501	19%
Community Development:	\$555,936.32	17%	17,448	17%
Stake-holding:	\$725,127.78	13%	13,343	13%
Community Partnerships:	\$523,234.18	16%	16,422	16%
Capacity Building:	\$490,532.05	15%	15,395	15%
Family Stabilization:	\$654,042.73	20%	20,527	20%
TOTALS:	\$3,270,213.66	100%	102,636	100%

* Averaged due to duplicate reporting of goals (see Executive Summary pages 5 & 6 for details).

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Homeless

Homeless Assistance (HA): Assistance that is provided for people who have no home or acceptable place to live in. The types of assistance provided these homeless individuals and families include: emergency shelter or lodging, transitional housing, and related assistance, i.e., essential supportive services.

Homeless Prevention Assistance (HP): Assistance means services that are provided for people who are in eminent danger of becoming homeless or faced with living without essential utility services prior to eviction from a rental or a mortgaged home. The types of services provided include: rental assistance, utility assistance, mortgage assistance, and landlord/tenant dispute resolution.

Local Statewide Programs' Summary

Contractors Utilized	16
Service Providers Utilized	135

UNDUPLICATED COUNTS - PEOPLE ASSISTED

The number of people provided assistance represent unduplicated people, to the extent possible. These numbers represent “families” (defined as “one family”) or a single person. Because some CSBG services benefit several family members, more people benefit from CSBG services than the unduplicated counts show.

Further, the unduplicated counts reflect only the first service provided for a person or family. Additional services received by that person or family during the program year are not recorded in these unduplicated numbers.

Realistically, there will be some duplication in state-wide compilations. Because of time and financial constraints and potential violations of client confidentiality, no attempt has been made to ascertain whether a person or family has received assistance through services in another Wyoming county.

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Compilation of National Goals

Goal I - Low-Income People Become More Self-Sufficient (Self Sufficiency)

Number of grantees reporting this Goal: **115**

<u>Outcome Level:</u>	Client/Family
<u>Units of Measure:</u>	Consumers, clients, individuals, families, enrollees, participants, and households
<u>Type of Change:</u>	Status, family functioning, attainment, and achievement
<u>Dimensions of Change:</u>	Income, education, family functioning, transportation, employment, housing, basic needs, community involvement, substance abuse, childcare, and health

Goal II - The Conditions in Which Low-Income People Live are Improved (Community Revitalization)

Number of grantees reporting this Goal: **102**

<u>Outcome Level:</u>	Community level
<u>Units of Measure:</u>	Wards, counties, townships, districts, neighborhoods, territories, and reservations
<u>Type of Change:</u>	Systems functioning, systems capacity, or community conditions
<u>Dimensions of Change:</u>	Public policy, equity, civic capital, service and support systems, and economic opportunity

Goal III - Low-Income People Own a Stake in Their Community (Community)

Number of grantees reporting this Goal: **77**

<u>Outcome Level:</u>	Community level
<u>Units of Measure:</u>	Wards, counties, townships, districts, neighborhoods, territories, and reservations
<u>Type of Change:</u>	Systems functioning, systems capacity, or community conditions
<u>Dimensions of Change:</u>	Public policy, equity, civic capital, service and support systems, and economic opportunity

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Goal IV - Partnerships Among Supporters and Providers of Services to Low-Income People are Achieved (Agency)

Number of grantees reporting this Goal: **93**

<u>Outcome Level:</u>	Agency Level
<u>Units of Measure:</u>	Agency, program, employee groups, departments, projects, and bargaining units
<u>Type of Change:</u>	Capacity and/or performance
<u>Dimensions of Change:</u>	Governance, linkages and relationships, compliance, cultural sensitivity and diversity, equity, workforce environment, planning, measurement, and evaluation, external communications, and information management

Goal V - Agencies Increase Their Capacity to Achieve Results (Agency)

Number of grantees reporting this Goal: **86**

<u>Outcome Level:</u>	Agency Level
<u>Units of Measure:</u>	Agency, program, employee groups, departments, projects, and bargaining units
<u>Type of Change:</u>	Capacity and/or performance
<u>Dimensions of Change:</u>	Governance, linkages and relationships, compliance, cultural sensitivity and diversity, equity, workforce environment, planning, measurement and evaluation, external communications, and information management

Goal VI - Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Support Systems (Client & Family Stability)

Number of grantees reporting this Goal: **118**

<u>Outcome Level:</u>	Client and family
<u>Units of Measure:</u>	Consumers, clients, individuals, families, enrollees, participants, and households
<u>Type of Change:</u>	Status, family functioning, attainment, and achievement
<u>Dimensions of Change:</u>	Income, education, family functioning, transportation, employment, housing, basic needs, community involvement, substance abuse, childcare, and health

Eligible entities and subcontractors are not expected to conduct activities or create services to reach each goal. It is understood that grantees provide a wide range of services directed at individuals, families, and community initiatives. In addition, the State and its grantees are continuously looking for ways to improve how to conduct business. Therefore, of the six national goals, each focuses on one of three areas:

- One client or family at a time (Client and Family);
- A community system or condition (Community); or
- An agency or program (Agency).

Consequently, if the services of a respective agency were designed to have an impact on low-income people one client or family at a time, they would not be expected to adopt a goal designed to measure a community condition or system. The same holds true if a respective agency is more directed toward community conditions or systems. They would adopt a goal designed to measure change in community systems or conditions. Obviously, some agencies may choose to direct their efforts to projects that relate to any combination of the three areas.

APPENDICES

The following Section contains appendices that are crucial to this State Plan.

OVERVIEW OF ATTACHMENTS (CSBG Operations Manual)

This Section follows the AAppendices@ Section, and is designed to assist grantees/service providers with information about CSBG Planning, with emphasis on Comprehensive or Strategic Planning and the ACommunity Action Plan@ as required; along with day-to-day program operations information and other applicable information. Please note revisions in the ACommunity Action Plan@, AThe Planning Process@, and AFinancial & Performance Reporting@ to incorporate instructions for meeting *WyoROMA* criteria (including the components of the State Strategic Plan and the Results-Oriented Management and Accountability (ROMA) Program).

APPENDICES

- A – State Assurances and Certifications
- B – Delegation of Authority Letter
- C – Federal Certification: Environmental Tobacco Smoke
- D – Federal Certification: Drug-Free Workplace
- E – Federal Certification: Regarding Lobbying
- F – Federal Certification: Debarment and Suspension
- G – Federal Certification: Nondiscrimination
- H – OMB Cost and Accounting Standards
- I – Child Support Services and Referrals

Brent D. Sherard, M.D., M.P.H., F.A.C.P., Director and State Health Officer

Governor Dave Freudenthal

APPENDIX A

September 1, 2009

Ref: S-2009-642

Ms. Josephine Robinson, Director
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, SW
5th Floor, West Wing
Washington, D.C. 20447

Dear Ms. Robinson:

It is the intent of the State of Wyoming to receive and administer Community Services Block Grant (CSBG) funds for Federal Fiscal Year (FFY) 2010, as set forth under the provisions of the Community Services Block Grant Act, Title VI, Subtitle B of the Omnibus Budget Reconciliation Act of 1981 (P.L. 97-35); Human Services Amendments of 1994, P.O. 103-252; the FFY 1996 CSBG Appropriation Legislation (P.L. 104-134); C.F.R. Title 45, Part 96; Coats Human Services Reauthorization Act of 1998 (P.L. 105-285), and the U.S. Department of Health and Human Services Block Grant Regulations.

As part of the annual application and plan required by Section 676 of the Community Services Block Grant Act, as amended (42 U.S.C. 9901 et. seq.) (The Act), as Director of the Wyoming Department of Health, I certify that the State of Wyoming agrees to the Assurances in Section 676 of the Act-

Programmatic Assurances

- (1) An assurance that funds made available through the grant or allotment will be used—
 - (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals—

(i) to remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);

(ii) to secure and retain meaningful employment;

(iii) to attain an adequate education, with particular attention toward improving literacy skills of the low-income families in the communities involved, which may include carrying out family literacy initiatives;

(iv) to make better use of available income;

(v) to obtain and maintain adequate housing and a suitable living environment;

(vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and

(vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to—

(I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and

(II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

(B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as—

(i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and

- (ii) after-school child care programs; and
 - (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts);
- (2) a description of how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle;
- (3) information provided by eligible entities in the State, containing—
 - (A) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under section 675C(a), targeted to low-income individuals and families in communities within the State;
 - (B) a description of how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations;
 - (C) a description of how funds made available through grants made under section 675C(a) will be coordinated with other public and private resources; and
 - (D) a description of how the local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting;
- (4) an assurance that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals;
- (5) an assurance that the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and a description of how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 101 of such Act, in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998;
- (6) an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community;

(7) an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D;

(8) an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b);

(9) an assurance that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations;

(10) an assurance that the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation;

(11) an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs;

(12) an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and a description of outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization; and

(13) information describing how the State will carry out the assurances [676(b)(13)].

Administrative Assurances

The State further agrees to the following administrative assurances, as required under the Community Services Block Grant Act:

(1) **STATE APPLICATION AND PLAN-** To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in Section 676 of the Act. [‘675A(b)] –

(2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [‘675C(a)(1) and (2)]

(3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. [‘675C (a)(3)]

(4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. [‘675C(b)(2)]

(5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675© regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [‘675(c)]

(6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or ‘675B for the period covered by the State Plan. [‘676(a)(2)(B)]

(7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State Community Services Block Grant program activities. [‘676(a)(1)]

(8) To hold at least one legislative hearing every three years in conjunction with the development of the State Plan.[’676(a)(3)]

(9) To make available for the public inspection each plan or revised State Plan in such a manner as will facilitate review of and comment on the plan. [’676(e)(2)]

(10) To conduct the following reviews of eligible entities:

(A) a full onsite review of each such entity at least once during each three-year period;

(B) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;

(C) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State; and

(D) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. [’678B(a)]

(11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State Plan, to provide services under the Community Services Block Grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:

(A) Inform the entity of the deficiency to be corrected;

(B) require the entity to correct the deficiency;

(C) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;

(D) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved; and

(E) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [’678(c)(a)]

(12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.

(13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. [678D(a)(3)]

(14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [678E(a)(1)].

(15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under 678E(a)(2) of the Act.

(16) To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.

(17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F(b)]

(18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [678FC]

(19) To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the Community Services Block Grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the Community Services Block Grant program. [679]

Other Administrative Certifications

The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee.. The State further agrees that it will require the language of this certification be included in any sub-awards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

By signing and submitting these assurances and certifications, the State of Wyoming assures and certifies that it will comply with the requirements of the Act. Further, all State contractors, or sub-grantees are required to provide certifications to the State that they will comply with the six (6) federal certifications as part of their application to the State.

The thirteen (13) programmatic assurances and the nineteen (19) administrative assurances will also be a formal requirement for CSBG local-level or sub-grantee applications to the State (as applicable).

The enclosed FFY 2010 CSBG State Plan clarifies the specific goals and objectives of the program, provides information on the types of activities and services that will be provided, the geographical areas to be served, the characteristics of the people to be served, the criteria and method established for the distribution of funds, a description of the public and legislative review and comment process, and other appropriate information.

The annual report for the State's CSBG program ending September 2009 will be submitted to you under separate cover.

The State of Wyoming's contact person for the CSBG Program is:

Mr. Jim Rolf, Manager
Community Services Programs
6101 Yellowstone Rd., Suite 510
Cheyenne, WY 82002

Telephone: (307) 777-8652
FAX: (307) 777-8545
e-mail: jim.rolf@health.wyo.gov

Sincerely,

Brent D. Sherard, M.D., M.P.H., F.A.C.P.
Director and State Health Officer
Wyoming Department of Health

BDS/JR/td

APPENDIX B

September 30, 2008

Ms. Josephine Robinson, Director
U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Division of State Assistance
370 L'Enfant Promenade, S.W., 5th Floor West
Washington, D.C. 20447

Dear Ms. Robinson:

This delegation of authority letter has been requested by the Wyoming Department of Health, Rural and Frontier Health Division, Community Services Programs. The purpose of this delegation is in regard to the Federal Fiscal Year 2009 Community Services Block Grant (CSBG) Program application, pursuant to Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended; Human Services Amendments of 1994, P.L. 103-252; the FY 1996 CSBG Appropriation Legislation, P.L. 104-134; C.F.R. Title 45, Part 96; Coats Human Services Reauthorization Act of 1998, P.L. 105-285, Department of Health and Human Services Block Grant Regulations and Current Poverty Income Guidelines.

I hereby delegate authority to Brent D. Sherard, M.D., M.P.H., Director and State Health Officer of the Wyoming Department of Health, to execute funding agreements and certification, provide assurances of compliance to the Secretary, and to perform similar acts relevant to the administration of the CSBG Program, until such time as this delegation of authority is rescinded in writing.

Sincerely,

Dave Freudenthal
Governor
State of Wyoming

BDS/jr/td

APPENDIX C
CERTIFICATION

Public Law 103-227, Part C, Environmental Tobacco Smoke

P.L. 103-227, also known as the Pro-Children Act of 1994, requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18, if the services are funded by the federal programs either directly or through states, or local government by Federal grant, contract, loan or loan guarantee.

By signing and submitting this assurance the grantee certifies that it will comply with the requirement of the Act. The grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for children=s services and that all subgrantees shall certify accordingly.

<u>Jim Rolf</u>	<u>Manager, Community Services Programs</u>
Typed or Printed Name	Title

_____ Signature	_____ Date
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(COPY OF ACT ATTACHED AFTER CERTIFICATION SIGNATURE PAGE)

PART C--ENVIRONMENTAL TOBACCO SMOKE

SEC. 1041. SHORT TITLE.

This part may be cited as the `Pro-Children Act of 1994'.

SEC. 1042. DEFINITIONS.

As used in this part:

- (1) **CHILDREN**- The term `children' means individuals who have not attained the age of 18.
- (2) **CHILDREN'S SERVICES**- The term `children's services' means the provision on a routine or regular basis of health, day care, education, or library services
 - (A) that are funded, after the date of the enactment of this Act, directly by the Federal Government or through state or local governments, by federal grant, loan, loan guarantee, or contract programs
 - (i) administered by either the Secretary of Health and Human Services or the Secretary of Education (other than services provided and funded solely under titles XVIII and XIX of the Social Security Act); or
 - (ii) administered by the Secretary of Agriculture in the case of a clinic (as defined in 7 CFR 246.2) under section 17(b)(6) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(6)), or
 - (B) that are provided in indoor facilities that are constructed, operated, or maintained with such federal funds, as determined by the appropriate Secretary in any enforcement action under this title, except that nothing in clause (ii) of subparagraph (A) is intended to include facilities (other than clinics) where coupons are redeemed under the Child Nutrition Act of 1966.
- (3) **PERSON**- The term `person' means any state or local subdivision thereof, agency of such state or subdivision, corporation, or partnership that owns or operates or otherwise controls and provides children's services or any individual who owns or operates or otherwise controls and provides such services.
- (4) **INDOOR FACILITY**- The term `indoor facility' means a building that is enclosed.
- (5) **SECRETARY**- The term `Secretary' means the Secretary of Health and Human Services.

SEC. 1043. NONSMOKING POLICY FOR CHILDREN'S SERVICES.

- (1) **PROHIBITION**- After the date of the enactment of this Act, no person shall permit smoking within any indoor facility owned or leased or contracted for and utilized by such person for provision of routine or regular kindergarten, elementary, or secondary education or library services to children.
- (2) **ADDITIONAL PROHIBITION**- After the date of the enactment of this Act, no person shall permit

smoking within any indoor facility (or portion thereof) owned or leased or contracted for by such person for the provision by such person of regular or routine health care or day care or early childhood development (Head Start) services to children or for the use of the employees of such person who provides such services, except that this subsection shall not apply to

(A) any portion of such facility that is used for inpatient hospital treatment of individuals dependent on, or addicted to, drugs or alcohol; and

(B) any private residence.

(C) **FEDERAL AGENCIES-**

(i) **KINDERGARTEN, ELEMENTARY, OR SECONDARY EDUCATION OR LIBRARY SERVICES-** After the date of the enactment of this Act, no federal agency shall permit smoking within any indoor facility in the United States operated by such agency, directly or by contract, to provide routine or regular kindergarten, elementary, or secondary education or library services to children.

(ii) **HEALTH OR DAY CARE OR EARLY CHILDHOOD DEVELOPMENT SERVICES-** After the date of the enactment of this Act, no federal agency shall permit smoking within any indoor facility (or portion thereof) operated by such agency, directly or by contract, to provide routine or regular health or day care or early childhood development (Head Start) services to children, except that this paragraph shall not apply to

(a) any portion of such facility that is used for inpatient hospital treatment of individuals dependent on, or addicted to, drugs or alcohol; and

(b) any private residence.

(iii) **APPLICATION OF PROVISIONS-** The provisions of paragraph (2) shall also apply to the provision of such routine or regular kindergarten, elementary or secondary education or library services in the facilities described in paragraph (2) not subject to paragraph (1).

(D) **NOTICE-** The prohibitions in subsections (a) through (c) shall be incorporated by publication of a notice in the Federal Register by the Secretary (in consultation with the heads of other affected agencies) and by such agency heads in funding arrangements involving the provision of children's services administered by such heads. Such prohibitions shall be effective 90 days after such notice is published, or 270 days after the date of the enactment of this Act, whichever occurs first.

(E) **SPECIAL WAIVER-**

(i) **IN GENERAL-** On receipt of an application, the head of the federal agency may grant a special waiver to a person described in subsection (a) who employs individuals who are members of a labor organization and provide children's services pursuant to a collective bargaining agreement that

- (a) took effect before the date of enactment of this Act; and
 - (b) includes provisions relating to smoking privileges that are in violation of the requirements of this section.
- (ii) **TERMINATION OF WAIVER-** A special waiver granted under this subsection shall terminate on the earlier of
 - (a) the first expiration date (after the date of enactment of this Act) of the collective bargaining agreement containing the provisions relating to smoking privileges; or
 - (b) the date that is 1 year after the date of the enactment of this Act.

(F) **CIVIL PENALTIES-**

- (i) **IN GENERAL-** Any failure to comply with a prohibition in this section shall be a violation of this section and any person subject to such prohibition who commits such violation may be liable to the United States for a civil penalty in an amount not to exceed \$1,000 for each violation, or may be subject to an administrative compliance order, or both, as determined by the Secretary. Each day a violation continues shall constitute a separate violation. In the case of any civil penalty under this section, the total amount shall not exceed the amount of federal funds received by such person for the fiscal year in which the continuing violations occurred. For the purpose of the prohibition in subsection (c), the term 'person' shall mean the head of the applicable federal agency or the contractor of such agency providing the services to children.
- (ii) **ADMINISTRATIVE PROCEEDING-** A civil penalty may be assessed in a written notice, or an administrative compliance order may be issued, by the Secretary only after an opportunity for a hearing in accordance with section 554 of title 5, United States Code. Before making such assessment or issuing such order, or both, the Secretary shall give written notice thereof to such person by certified mail with return receipt and provide therein an opportunity to request in writing not later than 30 days after the date of receipt of such notice such hearing. The notice shall reasonably describe the violation and be accompanied with the procedures for such hearing and a simple form to request such hearing if such person desires to use such form. If a hearing is requested, the Secretary shall establish by such certified notice the time and place for such hearing which should be located, to the greatest extent possible, at a location convenient to such person. The Secretary (or the Secretary's designee) and such person may consult to arrange a suitable date and location where appropriate.
- (iii) **CIRCUMSTANCES AFFECTING PENALTY OR ORDER-** In determining the amount of the civil penalty or the nature of the administrative compliance order, the Secretary shall take into account, as appropriate
 - (a) the nature, circumstances, extent, and gravity of the violation;
 - (b) with respect to the violator, any good faith efforts to comply, the importance of

achieving early and permanent compliance, the ability to pay or comply, the effect of the penalty or order on the ability to continue operation, any prior history of the same kind of violation, the degree of culpability, and any demonstration of willingness to comply with the prohibitions of this section in a timely manner; and

- (c) such other matters as justice may require.
- (iv) **MODIFICATION-** The Secretary may, as appropriate, compromise, modify, or remit, with or without conditions, any civil penalty or administrative compliance order. In the case of a civil penalty, the amount, as finally determined by the Secretary or agreed upon in compromise, may be deducted from any sums that the United States or its agencies or instrumentalities owes to the person against whom the penalty is assessed.
- (v) **PETITION FOR REVIEW-** Any person aggrieved by a penalty assessed or an order issued, or both, by the Secretary under this section may file a petition for judicial review thereof with the United States Court of Appeals for the District of Columbia Circuit or for any other circuit in which the person resides or transacts business. Such person shall provide a copy thereof to the Secretary or the Secretary's designee. The petition shall be filed within 30 days after the Secretary's assessment or order, or both, are final and have been provided to such person by certified mail. The Secretary shall promptly provide to the court a certified copy of the transcript of any hearing held under this section and a copy of the notice or order.
- (vi) **FAILURE TO COMPLY-** If a person fails to pay an assessment of a civil penalty or comply with an order, after either or both are final under this section, or after a court under paragraph (5) has entered a final judgment in favor of the Secretary, the Attorney General, at the request of the Secretary, shall recover the amount of the civil penalty (plus interest at then currently prevailing rates from the day either or both are final) or enforce the order in an action brought in the appropriate district court of the United States. In such action, the validity and appropriateness of the penalty or order or the amount of the penalty shall not be subject to review.

SEC. 1044. PREEMPTION.

Nothing in this part is intended to preempt any provision of law of a state or political subdivision of a state that is more restrictive than a provision of this part.

APPENDIX D

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

Page 1 of 4

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645(a)(1) and (b) provide that a federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorize under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies.
4. For grantees who are individuals, Alternate II applies.
5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for federal inspection. Failure to identify all known workplace constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

Criminal drug statute means a federal or non-federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about --
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted --
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).
 - (1) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

State of Wyoming_____

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

Signature_____Date _____

Title: Manager

Organization: Wyoming Department of Health, Community Services Programs

APPENDIX E

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No federal appropriated funds have paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ADisclosure Form to Report Lobbying,@ in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, of an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ADisclosure Form to Report Lobbying,@ in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by 1352, title 31 U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each failure.

Signature

Community Services Programs
Organization

Manager

Title

Date

APPENDIX F

Page 1 of 2

Certifications Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered Transactions

Instructions for Certifications

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. If necessary, the prospective participant shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the Department of Health and Human Services (HHS) determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when HHS determined that the prospective primary participant knowingly rendered an erroneous certification. In addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the HHS agency to whom this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms "covered transaction", "debarred", "suspended", "ineligible", "lower tier covered transaction", "participant", "person", "primary covered transaction", "principal", "proposal", and "voluntarily excluded", as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549: 45 CFR Part 76.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by HHS.
7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions", provided by HHS, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not

required to, check the Nonprocurement List (of excluded parties).

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is debarred, suspended, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered Transactions

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
 - (b) have not, within a 3-year period preceding this proposal, been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) are not presently indicted or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) have not, within a 3-year period preceding this application/proposal, had one or more public transactions (federal, state or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Grant No. FFY 2010 Community Services Block Grant Program

Jim Rolf, Manager

(Name and Title)

(Signature)

(Date)

APPENDIX G

NONDISCRIMINATION CERTIFICATION

Pursuant to P.L. 97-35, Section 677(a), as amended, I certify that no person shall, on the ground of race, color, national origin, sex, age, handicap or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with funds made available under this subtitle. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 or with respect to an otherwise qualified handicapped individual as provided in Section 50 of The Rehabilitation Act of 1973 shall also apply to any such program activity.

Jim Rolf

Typed or Printed Name

Manager, Community Services Programs

Title

Signature

Date

APPENDIX H

OMB COST AND ACCOUNTING STANDARDS CERTIFICATION

Pursuant to the Community Services Block Grant Act (P.L. 97-35, as amended), the Community Services Block Grant Program agrees to provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) will apply to all CSBG funds utilized by this organization.

Jim Rolf

Typed or Printed Name

Manager, Community Services Programs

Title

Signature

Date

APPENDIX I

CHILD SUPPORT SERVICES AND REFERRALS

Pursuant to the Community Services Block Grant Act (P.L. 97-35, as amended), the Community Services Block Grant Program agrees to provide an assurance that requires eligible entities and subcontractors to:

1. inform custodial parents in single-parent families that participate in programs, activities, or services carried out under the CSBG program about the availability of child support services; and
2. refer eligible parents to the child support offices of the state and local governments.

Jim Rolf

Typed or Printed Name

Manager, Community Services Programs

Title

Signature

Date

CSBG OPERATIONS MANUAL

The CSBG Operations Manual provides further information about the State of Wyoming's CSBG programs, systems, and related information. Its primary use is for grantees and prospective grantees, with the emphasis being on program planning, the application phase, program operations and contract management.

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COMMUNITY SERVICES BLOCK GRANT (CSBG) ASSURANCES

Governing Boards

Statement of Governing Board Assurances

Pursuant to the Community Services Block Grant Act, Title VI, Subtitle B of the Omnibus Budget Reconciliation Act of 1981 (P.L. 97-35); Human Services Amendments of 1994, P.O. 103-252; the FFY 1996 CSBG Appropriation Legislation (P.L. 104-134); C.F.R. Title 45, Part 96; Coats Human Services Reauthorization Act of 1998 (P.L. 105-285), and the U.S. Department of Health and Human Services Block Grant Regulations; and as part of the annual application required by Section 676 of the Community Services Block Grant Act, as amended (42 U.S.C. 9901 et. Seq.) (The Act); the governing board hereby agrees, to the extent applicable, to:

- (1) Use the funds available through this grant or allotment:
 - (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable the families and individuals to:
 - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a Board program carried out under part A of title IV of the Social Security Act);
 - (ii) secure and retain meaningful employment;
 - (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
 - (iv) make better use of available income;
 - (v) obtain and maintain adequate housing and a suitable living environment;
 - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

- (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth medication, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and
 - (c) To make more effective use of, and to coordinate with, other programs (including state welfare reform efforts). [=676(b)(1)]
- (2) To describe how the Board intends to use discretionary funds made available in accordance with the Community Services Block Grant Program, including a description of how the Board will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant Program; [=676(b)(2)].
- (3) To provide information provided by service providers in the Community, including:
 - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low-income individuals and families within the community.
 - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
 - (c) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and,
 - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the community services block grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [=676(b)(3)]
- (4) To ensure that service providers in the Community will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. [=676(b)(4)]
- (5) That the Board and the service providers in the Community will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and the Board and its Community Services Block Grant service providers will coordinate the provision of employment and training activities in the communities with entities providing activities through state-wide and local workforce investment systems under the Workforce Investment Act of 1998; [=676(b)(5)]

- (6) To ensure coordination between antipoverty programs in the community, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such communities. [=676(b)(6)]
- (7) To permit and cooperate with federal investigations undertaken in accordance with section 678D of the Act. [=676(b)(7)]
- (8) That the Board and service providers in the Community will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the Board, including religious organizations, charitable groups, and community organizations. [=676(b)(9)]
- (9) That the Board will establish procedures under which a low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. [=676(b)(10)]
- (10) That the Board will prepare, as a condition to receipt of funding a Community Action Plan (which shall be submitted to the Wyoming Community Services Programs) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs; [=676(b)(11)]
- (11) That the Board and all of it=s Community Services Block Grant service providers in the Community will, for FFY 2001, participate in the Results Oriented Management and Accountability System (*WyoROMA*) pursuant to Section 678E(b) of the Act [=676(b)(12)]
- (12) To provide information describing how the Board will carry out these assurances. [=676(b)(13)] (How each assurance will be carried out or implemented).

I hereby certify that the _____
will comply with all the provisions listed above as items (1) through (12).

(Printed Name & Title)

(Signature)

(Date)

CERTIFICATION

(Page 1 of 5)

Public Law 103-227, Part C, Environmental Tobacco Smoke

P.L. 103-227, also known as the Pro-Children Act of 1994, requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18, if the services are funded by the federal programs either directly or through states, or local government by federal grant, contract, loan or loan guarantee.

By signing and submitting this assurance the grantee certifies that it will comply with the requirement of the Act. The grantee further agrees that it will require the language of this certification be included in any subawards which contain provisions for children's services and that all subgrantees shall certify accordingly.

Typed or Printed Name

Title

Signature

Date

(COPY OF ACT ATTACHED AFTER CERTIFICATION SIGNATURE PAGE)

SEC. 1041. SHORT TITLE.

This part may be cited as the 'Pro-Children Act of 1994'.

SEC. 1042. DEFINITIONS.

As used in this part:

- (1) CHILDREN- The term 'children' means individuals who have not attained the age of 18.
- (2) CHILDREN'S SERVICES- The term 'children's services' means the provision on a routine or regular basis of health, day care, education, or library servicesB
 - (A) that are funded, after the date of the enactment of this Act, directly by the Federal Government or through state or local governments, by federal grant, loan, loan guarantee, or contract programsB
 - (i) administered by either the Secretary of Health and Human Services or the Secretary of Education (other than services provided and funded solely under titles XVIII and XIX of the Social Security Act); or
 - (ii) administered by the Secretary of Agriculture in the case of a clinic (as defined in 7 CFR 246.2) under section 17(b)(6) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(6)), or
 - (B) that are provided in indoor facilities that are constructed, operated, or maintained with such federal funds, as determined by the appropriate Secretary in any enforcement action under this title, except that nothing in clause (ii) of subparagraph (A) is intended to include facilities (other than clinics) where coupons are redeemed under the Child Nutrition Act of 1966.
- (3) PERSON- The term 'person' means any state or local subdivision thereof, agency of such state or subdivision, corporation, or partnership that owns or operates or otherwise controls and provides children's services or any individual who owns or operates or otherwise controls and provides such services.
- (4) INDOOR FACILITY- The term 'indoor facility' means a building that is enclosed.
- (5) SECRETARY- The term 'Secretary' means the Secretary of Health and Human Services.

SEC. 1043. NONSMOKING POLICY FOR CHILDREN'S SERVICES.

(Page 3 of 5)

- (1) PROHIBITION- After the date of the enactment of this Act, no person shall permit smoking within any indoor facility owned or leased or contracted for and utilized by such person for provision of routine or regular kindergarten, elementary, or secondary education or library services to children.
- (2) ADDITIONAL PROHIBITION- After the date of the enactment of this Act, no person shall permit smoking within any indoor facility (or portion thereof) owned or leased or contracted for by such person for the provision by such person of regular or routine health care or day care or early childhood development (Head Start) services to children or for the use of the employees of such person who provides such services, except that this subsection shall not apply to—
 - (A) any portion of such facility that is used for inpatient hospital treatment of individuals dependent on, or addicted to, drugs or alcohol; and
 - (B) any private residence.
- (3) FEDERAL AGENCIES-
 - (A) KINDERGARTEN, ELEMENTARY, OR SECONDARY EDUCATION OR LIBRARY SERVICES- After the date of the enactment of this Act, no federal agency shall permit smoking within any indoor facility in the United States operated by such agency, directly or by contract, to provide routine or regular kindergarten, elementary, or secondary education or library services to children.
 - (B) HEALTH OR DAY CARE OR EARLY CHILDHOOD DEVELOPMENT SERVICES- After the date of the enactment of this Act, no federal agency shall permit smoking within any indoor facility (or portion thereof) operated by such agency, directly or by contract, to provide routine or regular health or day care or early childhood development (Head Start) services to children, except that this paragraph shall not apply to
 - (i) any portion of such facility that is used for inpatient hospital treatment of individuals dependent on, or addicted to, drugs or alcohol; and
 - (ii) any private residence.
 - (C) APPLICATION OF PROVISIONS- The provisions of paragraph (2) shall also apply to the provision of such routine or regular kindergarten, elementary or secondary education or library services in the facilities described in paragraph (2) not subject to paragraph (1).
- (4) NOTICE- The prohibitions in subsections (a) through (c) shall be incorporated by publication of a notice in the Federal Register by the Secretary (in consultation with the heads of other affected agencies) and by such agency heads in funding arrangements involving the provision of children's services administered by such heads. Such prohibitions shall be effective 90 days after such notice is published, or 270 days after the date of the enactment of this Act, whichever occurs first.

(5) SPECIAL WAIVER-

(Page 4 of 5)

- (A) IN GENERAL- On receipt of an application, the head of the federal agency may grant a special waiver to a person described in subsection (a) who employs individuals who are members of a labor organization and provide children's services pursuant to a collective bargaining agreement that
- (i) took effect before the date of enactment of this Act; and
 - (ii) includes provisions relating to smoking privileges that are in violation of the requirements of this section.
- (B) TERMINATION OF WAIVER- A special waiver granted under this subsection shall terminate on the earlier of
- (i) the first expiration date (after the date of enactment of this Act) of the collective bargaining agreement containing the provisions relating to smoking privileges; or
 - (ii) the date that is 1 year after the date of the enactment of this Act.

(6) CIVIL PENALTIES-

- (A) IN GENERAL- Any failure to comply with a prohibition in this section shall be a violation of this section and any person subject to such prohibition who commits such violation may be liable to the United States for a civil penalty in an amount not to exceed \$1,000 for each violation, or may be subject to an administrative compliance order, or both, as determined by the Secretary. Each day a violation continues shall constitute a separate violation. In the case of any civil penalty under this section, the total amount shall not exceed the amount of federal funds received by such person for the fiscal year in which the continuing violations occurred. For the purpose of the prohibition in subsection (c), the term 'person' shall mean the head of the applicable federal agency or the contractor of such agency providing the services to children.
- (B) ADMINISTRATIVE PROCEEDING- A civil penalty may be assessed in a written notice, or an administrative compliance order may be issued, by the Secretary only after an opportunity for a hearing in accordance with section 554 of title 5, United States Code. Before making such assessment or issuing such order, or both, the Secretary shall give written notice thereof to such person by certified mail with return receipt and provide therein an opportunity to request in writing not later than 30 days after the date of receipt of such notice such hearing. The notice shall reasonably describe the violation and be accompanied with the procedures for such hearing and a simple form to request such hearing if such person desires to use such form. If a hearing is requested, the Secretary shall establish by such certified notice the time and place for such hearing which should be located, to the greatest extent possible, at a location convenient to such person. The Secretary (or the Secretary's designee) and such person may consult to arrange a suitable date and location where appropriate.

- (C) CIRCUMSTANCES AFFECTING PENALTY OR ORDER- In determining the amount of the civil penalty or the nature of the administrative compliance order, the Secretary shall take into account, as appropriateB
- (i) the nature, circumstances, extent, and gravity of the violation;
 - (ii) with respect to the violator, any good faith efforts to comply, the importance of achieving early and permanent compliance, the ability to pay or comply, the effect of the penalty or order on the ability to continue operation, any prior history of the same kind of violation, the degree of culpability, and any demonstration of willingness to comply with the prohibitions of this section in a timely manner; and
 - (iii) such other matters as justice may require.
- (D) MODIFICATION- The Secretary may, as appropriate, compromise, modify, or remit, with or without conditions, any civil penalty or administrative compliance order. In the case of a civil penalty, the amount, as finally determined by the Secretary or agreed upon in compromise, may be deducted from any sums that the United States or its agencies or instrumentalities owes to the person against whom the penalty is assessed.
- (E) PETITION FOR REVIEW- Any person aggrieved by a penalty assessed or an order issued, or both, by the Secretary under this section may file a petition for judicial review thereof with the United States Court of Appeals for the District of Columbia Circuit or for any other circuit in which the person resides or transacts business. Such person shall provide a copy thereof to the Secretary or the Secretary's designee. The petition shall be filed within 30 days after the Secretary's assessment or order, or both, are final and have been provided to such person by certified mail. The Secretary shall promptly provide to the court a certified copy of the transcript of any hearing held under this section and a copy of the notice or order.
- (F) FAILURE TO COMPLY- If a person fails to pay an assessment of a civil penalty or comply with an order, after either or both are final under this section, or after a court under paragraph (5) has entered a final judgment in favor of the Secretary, the Attorney General, at the request of the Secretary, shall recover the amount of the civil penalty (plus interest at then currently prevailing rates from the day either or both are final) or enforce the order in an action brought in the appropriate district court of the United States. In such action, the validity and appropriateness of the penalty or order or the amount of the penalty shall not be subject to review.

SEC. 1044. PREEMPTION.

Nothing in this part is intended to preempt any provision of law of a state or political subdivision of a state that is more restrictive than a provision of this part.

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645(a)(1) and (b) provide that a federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies.
4. For grantees who are individuals, Alternate II applies.
5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

Criminal drug statute means a federal or non-federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about --
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
 - (1) Abide by the terms of the statement; and

- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the federal agency has designated a central point for the receipt of such notices.

Notice shall include the identification number(s) of each affected grant;

- (f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted --
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).
 - (1) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the federal

agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

Signature_____ Date _____

Title_____

Organization_____

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No federal appropriated funds have paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ADisclosure Form to Report Lobbying,@ in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, of an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ADisclosure Form to Report Lobbying,@ in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by 1352, title 31 U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each failure.

Signature

Organization

Title

Date

Instructions for Certifications

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. If necessary, the prospective participant shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the Department of Health and Human Services (HHS) determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when HHS determined that the prospective primary participant knowingly rendered an erroneous certification. In addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the HHS agency to whom this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms "covered transaction", "debarred", "suspended", "ineligible", "lower tier covered transaction", "participant", "person", "primary covered transaction", "principal", "proposal", and "voluntarily excluded", as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549: 45 CFR Part 76.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by HHS.
7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions", provided by HHS, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Nonprocurement List (of excluded parties).

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is debarred, suspended, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered Transactions

1. The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
 - (b) have not, within a 3-year period preceding this proposal, been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) are not presently indicted or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) have not, within a 3-year period preceding this application/proposal, had one or more public transactions (federal, state or local) terminated for cause or default.
2. Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Grant No. FFY 2010 Community Services Block Grant Program

Typed or Printed Name

Title

Signature

Date

NONDISCRIMINATION CERTIFICATION

Pursuant to P.L. 97-35, Section 677(a), as amended, I certify that no person shall, on the ground of race, color, national origin, sex, age, handicap or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with funds made available under this subtitle. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 or with respect to an otherwise qualified handicapped individual as provided in Section 50 of The Rehabilitation Act of 1973 shall also apply to any such program activity.

Typed or Printed Name

Title

Signature

Date

OMB COST AND ACCOUNTING STANDARDS CERTIFICATION

Pursuant to the Community Services Block Grant Act (P.L. 97-35, as amended), the

agrees to provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-133) will apply to all CSBG funds utilized by this organization.

Typed or Printed Name

Title

Signature

Date

AUDITS

Refer to the Audits Section of the State Plan for more detail. The following is a summary of the audit requirements for State contractors (eligible entities).

The Wyoming Department of Audit, consistent with federal requirements, has mandated that contractors of the State who receive \$500,000 or more of federal funds from any sources. The Federal Government requires audited financial statements (audits) in such instances.

It will be the responsibility of the Wyoming Department of Health (WDH), Community Services Programs (CSP) to monitor and follow-up on the scheduling of audits, as well as the findings. Previously, this was the responsibility of the Department of Audit.

Audit requirements will now be specifically delineated in contracts between state recipients (eligible entities) and the WDH/CSP. Failure to have audits performed will result in suspension and/or termination of funds.

Refer to the Audits Section of the State Plan regarding allowable and/or unallowable costs for audits.

A copy of each audited financial statement must be sent to the WDH/CSP for its review. The WDH/CSP will review each eligible entity's status regarding scheduling and performance of such audits.

Once the audit is received and reviewed by the WDH/CSP, a copy will be sent to the WDH Fiscal Services Office, and the Wyoming Department of Audit.

Follow-up on the audit report, as necessary, will be performed by the WDH/CSP, the WDH Fiscal Services Office, and the Wyoming Department of Audit.

The Office of Management and Budget (OMB) Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, requires that pass-through entities ensure that subrecipients expending \$500,000 or more in Federal awards during the subrecipient's fiscal year meet the audit requirement of OMB Circular A-133.

Affirmation of Audit

Contractor Name: _____

Taxpayer Identification Number (TIN): _____

Section 1: If section does not apply, please complete section 2.

As Contractor and recipient of grant funds from the **CSBG Program**, we have had an A-133 audit during our last fiscal year because we receive over \$500,000.00 in Federal Funds. A copy of the audit is provided with this document.

_____	_____
Grantee Fiscal Year	Combined Federal dollars

_____	_____
Signature of Contractor	Date

OR

As Contractor and recipient of grant funds from the **CSBG Program**, we have had an A-133 audit during our last fiscal year because we receive over \$500,000.00 in Federal Funds. There were no reported finding related to the audit.

_____	_____
Grantee Fiscal Year	Combined Federal dollars

_____	_____
Signature of Contractor	Date

OR

As Contractor and recipient of grant funds from the **CSBG Program**, we have **not** had an audit during our last fiscal year.

_____	_____
Grantee Fiscal Year	Combined Federal dollars

_____	_____
Signature of Contractor	Date

Section 2: Please complete section 2, if section 1 does not apply.

As Contractor and recipient of grant funds from the **CSBG Program**, I assert that our entity has not received over \$500,000 in federal dollars and do not have to have an A-133 audit completed by state or federal law.

_____	_____
Grantee Fiscal Year	Combined Federal dollars

_____	_____
Signature of Contractor	Date

CHILD SUPPORT SERVICES AND REFERRALS

Pursuant to the Community Services Block Grant Act (P.L. 97-35, as amended), the _____
_____ agrees to provide an assurance that requires eligible entities and subcontractors to:

1. inform custodial parents in single-parent families that participate in programs, activities, or services carried out under the CSBG program about the availability of child support services; and
2. refer eligible parents to the child support offices of the state and local governments.

Typed or Printed Name

Title

Signature

Date

HHS Poverty Guidelines

DEPARTMENT OF HEALTH AND HUMAN SERVICES Office of the Secretary

Annual Update of the HHS Poverty Guidelines

AGENCY: Department of Health and Human Services.

ACTION: Notice.

SUMMARY: This notice provides an update of the HHS poverty guidelines to account for last calendar year's increase in prices as measured by the Consumer Price Index.

DATES: *Effective Date:* Date of publication, unless an office administering a program using the guidelines specifies a different effective date for that particular program.

ADDRESSES: Office of the Assistant Secretary for Planning and Evaluation, Room 404E, Humphrey Building, Department of Health and Human Services (HHS), Washington, DC 20201.

FOR FURTHER INFORMATION CONTACT: For information about how the guidelines are used or how income is defined in a particular program, contact the federal, state, or local office that is responsible for that program. Contact information for two frequently requested programs is given below:

For information about the Hill-Burton Uncompensated Services Program (free or reduced-fee health care services at certain hospitals and other facilities for persons meeting eligibility criteria involving the poverty guidelines), contact the Office of the Director, Division of Facilities Compliance and Recovery, Health Resources and Services Administration, HHS, Room 10-105, Parklawn Building, 5600 Fishers Lane, Rockville, Maryland 20857. To speak to a person, call (301) 443-5656. To receive a Hill-Burton information package, call 1-800-638-0742 (for callers outside Maryland) or 1-800-492-0359 (for callers in Maryland). You also may visit <http://www.hrsa.gov/hillburton/default.htm>. The Division of Facilities Compliance and Recovery notes that as set by 42 CFR 124.505(b), the effective date of this update of the poverty guidelines for facilities obligated under the Hill-Burton Uncompensated Services Program is sixty days from the date of this publication.

For information about the percentage multiple of the poverty guidelines to be used on immigration forms such as USCIS Form I-864, Affidavit of Support, contact U.S. Citizenship and Immigration Services at 1-800-375-5283 or visit <http://www.uscis.gov/files/form/I-864p.pdf>.

For information about the number of people in poverty or about the Census Bureau poverty thresholds, visit the Poverty section of the Census Bureau's Web site at <http://www.census.gov/hhes/www/poverty.html> or contact the Census Bureau's Demographic Call Center Staff at (301) 763-2422 or 1-866-758-1060 (toll-free).

For general questions about the poverty guidelines themselves, contact Gordon Fisher, Office of the Assistant Secretary for Planning and Evaluation, Room 404E, Humphrey Building, Department of Health and Human Services, Washington, DC 20201—telephone: (202) 690-7507—or visit <http://www.aspe.hhs.gov/poverty/>.

SUPPLEMENTARY INFORMATION:

Background

Section 673(2) of the Omnibus Budget Reconciliation Act (OBRA) of 1981 (42 U.S.C. 9902(2)) requires the Secretary of the Department of Health and Human Services to update, at least annually, the poverty guidelines, which shall be used as an eligibility criterion for the Community Services Block Grant program. The poverty guidelines also are used as an eligibility criterion by a number of other federal programs. The poverty guidelines issued here are a simplified version of the poverty thresholds that the Census Bureau uses to prepare its estimates of the number of individuals and families in poverty.

As required by law, this update is accomplished by increasing the latest published Census Bureau poverty thresholds by the relevant percentage change in the Consumer Price Index for All Urban Consumers (CPI-U). The guidelines in this 2009 notice reflect the 3.8 percent price increase between calendar years 2007 and 2008. After this inflation adjustment, the guidelines are rounded and adjusted to standardize the differences between family sizes. The same calculation procedure was used this year as in previous years. (Note that these 2009 guidelines are roughly equal to the poverty thresholds for calendar year 2008 which the Census Bureau expects to publish in final form in August 2009.) The guideline figures shown represent annual income.

The 2009 Poverty Guidelines for the 48 Contiguous States and the District of Columbia	
Persons in family	Poverty guideline
1	\$10,830
2	14,570
3	18,310
4	22,050
5	25,790
6	29,530
7	33,270
8	37,010
For families with more than 8 persons, add \$3,740 for each additional person.	
2009 Poverty Guidelines for Alaska	
Persons in family	Poverty guideline
1	\$13,530
2	18,210
3	22,890
4	27,570
5	32,250
6	36,930
7	41,610
8	46,290
For families with more than 8 persons, add \$4,680 for each additional person.	

2009 Poverty Guidelines for Hawaii	
Persons in family	Poverty guideline
1	\$12,460
2	16,760
3	21,060
4	25,360
5	29,660
6	33,960
7	38,260
8	42,560
For families with more than 8 persons, add \$4,300 for each additional person.	

SOURCE: *Federal Register*, Vol. 74, No. 14, January 23, 2009, pp. 4199–4201

Separate poverty guideline figures for Alaska and Hawaii reflect Office of Economic Opportunity administrative practice beginning in the 1966–1970 period. (Note that the Census Bureau poverty thresholds—the version of the poverty measure used for statistical purposes—have never had separate figures for Alaska and Hawaii.) The poverty guidelines are not defined for Puerto Rico or other outlying jurisdictions. In cases in which a federal program using the poverty guidelines serves any of those jurisdictions, the federal office that administers the program is generally responsible for deciding whether to use the contiguous-states-and-DC guidelines for those jurisdictions or to follow some other procedure.

Due to confusing legislative language dating back to 1972, the poverty guidelines have sometimes been mistakenly referred to as the “OMB” (Office of Management and Budget) poverty guidelines or poverty line. In fact, OMB has never issued the guidelines; the guidelines are issued each year by the Department of Health and Human Services. The poverty guidelines may be formally referenced as “the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2).”

Some programs use a percentage multiple of the guidelines (for example, 125 percent or 185 percent of the guidelines), as noted in relevant authorizing legislation or program regulations. Non-federal organizations that use the poverty guidelines under their own authority in non-federally funded activities can choose to use a percentage multiple of the guidelines such as 125 percent or 185 percent.

The poverty guidelines do not make a distinction between farm and non-farm families, or between aged and non-aged units. (Only the Census Bureau poverty thresholds have separate figures for aged and non-aged one-person and two person units.)

Note that this notice does not provide definitions of such terms as “income” or “family.” This is because there is considerable variation in how different programs that use the guidelines define these terms, traceable to the different laws and regulations that govern the various programs. Therefore, questions about how a particular program applies the poverty guidelines (for example, Is income before or after taxes? Should a particular type of income be counted? Should a particular person be counted in the family or household unit?) should be directed to the organization that administers the program; that

organization has the responsibility for making decisions about definitions of such terms as "income" or "family" (to the extent that the definition is not already contained in legislation or regulations).

Dated: January 16, 2009.

Michael O. Leavitt,

Secretary of Health and Human Services.

[FR Doc. E9-1510 Filed 1-22-09; 8:45 am]

CSBG COMMUNITY ACTION PLAN

The federal requirements mandate that the State require from each eligible contracting entity, as a condition to its receipt of funding under the CSBG Act, a Community Action Plan that includes:

- (A) A Community Needs Assessment, including food needs;
- (B) A description of the service delivery system targeted to low-income individuals and families in the service area;
- (C) A description of how linkages will be developed to fill identified gaps in service through information, referral, case management, and follow-up consultations;
- (D) A description of how funding under this Act will be coordinated with other public and private resources; and
- (E) A description of outcome measures to be used to monitor success in promoting self-sufficiency, family stability, and community revitalization.

The following information is provided to assist you in addressing these requirements.

(A) **Community Needs Assessment** - this assessment should cover the entire service delivery area and not be limited to only those projects/activities that have been traditionally funded through the CSBG Program. Sources of information will include current and past agencies that have provided CSBG services; other public agencies such as the Department of Family Services, Department of Job Services, Public Health Agencies, local Education Agencies, and the Job Training Partnership Act (JTPA) Programs; and other private agencies who have a role in the delivery of local human services. In addition, assessment surveys directed to the low-income citizens will provide input concerning the community needs of the low-income citizens as they see it.

The community needs assessment should be undertaken and completed prior to any decisions by the governing board (state contractor) to decide funding priorities. Appropriate community needs assessments should lead to funding decisions that lead to providing appropriate assistance/activities. The assessments should not be viewed simply as another requirement to meet in order to obtain federal funds, but should be viewed as a valuable tool to assist the decision makers to make funding decisions that are most appropriate and which are based on the needs of the low-income people in the community, as evidenced by the assessments. The *WyoROMA* criteria included in this document, should serve as the basis for problem identification, planning, oversight, and evaluation of local projects and should, therefore, be an integral part of the needs assessment.

A description of how the assessment was accomplished, the rationale of how the needs were determined and ranked, and identification of and rationale for those priority needs that were chosen for CSBG funding should be included, at a minimum, in your application.

Additionally, the state Contractor will ensure that a Acomposite needs assessment@ form that summarizes the various local project assessments will be completed and submitted with the application.

(B) **Service Delivery System Description** - this description should identify the role of the various agencies (including the local government) that have a direct and/or supportive role in the delivery of CSBG services and activities, as well as the other local public and private agencies that perform work in the Ahuman services@ field. The description should be clear enough for an uninformed reader to obtain a general understanding of the roles and relationships that each agency/program has in the human services delivery system. A listing of all appropriate agencies should be included as part of this description of the service delivery system.

(C) **Description of Linkages** - this description should clarify how the linkages were developed and how they are utilized with other agencies in the human services field; the description should show how (and to what extent) information, referral, case management, and follow-up consultations are utilized by the CSBG-funded agencies.

(D) **Description of Coordination** - this description should explain how coordination of funding is accomplished between agencies (both CSBG-funded and non-CSBG). Since the description of linkages and coordination is so closely linked, the two descriptions could be written together at the same time. A key to remember is that the CSBG funds should be used as a last resort, i.e., if a person's needs can be addressed in a non-CSBG program, that person should not receive services from the CSBG-funded agency, other than through referral to the non-CSBG program.

(E) **Description of WyoROMA Elements** - For purposes of planning and management of Community projects, consideration must be given to Goals, Objectives, Strategies, Outcomes, Outputs, Performance Targets, and Milestones, as described in the APlanning Process@ Section of this document (following). These planning elements are consistent with the State Strategic Plan in use by Wyoming State Government and the Results-Oriented Management and Accountability (ROMA) system in use by the Federal Office of Community Services.

WyoROMA Elements must show the relationship to the six (6) National Goals allowable under the CSBG Program, as described in the APlanning Process@ Section of this document. The six National Goals are:

- (1) Low-income people becoming more self-sufficient,
- (2) The conditions in which low-income people live are improved,
- (3) Low-income people own a stake in their community,
- (4) Partnerships among supporters and providers of services to low-income people are achieved,
- (5) Agencies increase their capacity to achieve results, and
- (6) Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive environments.

Your WyoROMA elements should be directed toward one or more of the 6 National Goals. Some examples of WyoROMA Elements are found in the APlanning Process@ Section of this document.

PERFORMING A COMMUNITY NEEDS ASSESSMENT

The assessment of need is normally the first step of any planning process because planning for the future simply cannot be done effectively until the existing conditions of the community are clearly understood.

A community needs assessment can often be the most time-consuming step in the overall planning process but, given its importance, it is well worth the effort. Conversely, conducting a community needs assessment is a relatively inexpensive step in the process.

Input for a community needs assessment should be gathered from many sources, i.e., local officials, service providers, general citizenry, and target group populations. Public meetings, and/or surveys of residents and interviews with knowledgeable citizens can help greatly to ascertain a community's assessment of needs.

Generally, citizens' impressions of needs make up the qualitative assessment of needs; equally as important is the quantitative assessment of needs. The information needed for quantitative assessment is generally available through on-going data collection efforts of private and public human services delivery agencies. However, sometimes additional information and analysis is necessary to pull together the qualitative and quantitative data, i.e.,

what types of needs exist and how great are they?

PERFORMING A COMMUNITY RESOURCE INVENTORY

Along with the community assessment of needs, it is necessary to determine what community resources are currently available to properly address those identified needs. Normally, resources can be identified as two types: (1) presently provided services; and (2) other available resources that can be utilized to support new programs directed to new or unmet needs.

A resource inventory can provide a good accounting of all services available and can serve the following purposes: (1) it shows how public and private human services are being utilized in the community, and (2) it allows for the identification of possible areas of flexibility for using the resources more effectively.

The resource inventory and community needs assessment can occur at the same time. One of the easier ways to do this is to develop a questionnaire that is designed to obtain responses for both. Furthermore, the two steps of community needs assessment and resource inventory can be interchangeable in their sequence if necessary. Some examples of questions asked in collecting information for a resource inventory could be:

- X What services does the agency provide, and who benefits from them?
- X How much money does the agency spend on these services, and where do the funds come from?
- X How many clients does the agency serve?
- X What is the maximum number of clients the agency could serve?
- X What possibility is there for this agency to coordinate its work with other agencies?
- X What are the stumbling blocks to this agency's working with other agencies/programs (i.e., regulations, politics, etc.)?

When the responses from all service agencies are analyzed, better information can be made available about how community resources are being used. Decision-makers (i.e., local elected officials) should then be able to tell:

- X specifically, whose needs are being met by which agencies;
- X whether agencies are serving as many people as they could;
- X whether several agencies in a categorical program (i.e., employment) may be duplicating efforts; and
- X whether there are areas in need of greater coordination so that services may be more effectively provided with a minimum of duplication.

COMPARING RESOURCES TO IDENTIFIED NEEDS

Basically, comparing the results of a community needs assessment with the results of a resource inventory will help to indicate how service delivery agencies are currently meeting the needs of the community. It cannot be over-emphasized that this is a step that must precede any direction-setting for the future.

In some cases, the comparison may show that resources currently match the needs. In these cases, decision-makers should assure that the adequate resources continue to be available, assuming a significant need remains. Conversely, in areas where services do not adequately meet the needs, consideration should be given to policy changes and new uses of resources to increase the provisions of services.

The comparison of needs and resources should also help local officials answer another question: are the programs meeting their originally designed intent? In other words, while it is basic to know whether or not there are enough services available to match the needs, it is crucial to be certain that the services provided really assist the clients in the way that they were intended to.

Realistically, it is highly unlikely that all identified needs can be met at the same time, due to limited funds, time constraints and other factors. However, the first three (3) steps of the planning process (i.e., the needs assessment, the resource inventory, and the comparison of the two) should allow a rational charting of the directions a community must take to move toward meeting the most urgent needs of its citizens.

IDENTIFYING UNMET NEEDS & SETTING PRIORITIES AMONG THEM

Because the list of unmet needs may be long, and the community may not be able to adequately respond to all of them initially, it is crucial to set priorities among the identified needs. Basically, this setting of priorities should be the focus of ultimate policy-making efforts.

It is important that the setting of priorities involve all persons or groups concerned, i.e., local officials, service agencies, clients, and others. Equally important is that everyone involved should reach a mutual decision about what kinds of needs should be first addressed. The priorities should also represent the views of people in the community who are experiencing problems, as well as those who have the responsibility for providing services. Community residents' views could be collected by surveys and/or expressed in public meetings called for that expressed purpose.

It is necessary to decide what criteria will be used to set priorities among needs. A suggested way to do this is to ask people involved exactly what kind of services they would like under ideal circumstances, i.e., if there were no financial or time constraints. Priority could then be given to addressing needs which have the following characteristics:

- (1) needs which affect the largest number of people;
- (2) needs which are life-threatening (i.e., malnutrition);
- (3) needs which adversely affect the local economy (i.e., a high unemployment rate); and
- (4) needs which are interrelated to other needs (i.e. emergency food/shelter/medical assistance).

After consideration of what kinds of needs people want to see addressed under ideal conditions (addressed under ROMA criteria as AOutcome Statements@), thought will have to be given to what kinds of needs can be realistically met (addressed under ROMA criteria as APerformance Targets@). The choices should be viewed as to the potential short-term and long-range impacts (addressed as AOutcomes@ in the Wyoming Strategic Plan.

The State CSBG Plan & Operations Manual should be utilized to obtain additional information concerning the planning process. The Section entitled AThe Planning Process@ provides information necessary for incorporating the principles of *WyoROMA* in both the CSBG Application and monthly performance reporting. In

addition, new performance reporting forms and instructions can be found in this Operations Manual.

The following ACommunity Needs Assessment Questionnaire@ should be completed as part of the application process. The information from that questionnaire will be a valuable aid to the applicant in preparing the WyoROMA information required as a part of CSBG Applications and funding requests.

COMMUNITY NEEDS ASSESSMENT QUESTIONNAIRE

(1) Please rank in order of priority the following community human service needs: (1 being the highest priority; 2 being the next highest priority, etc.)

___ **Employment and Training:** includes job training; job counseling; job development; job referral & follow-up; work experience; spot labor; employment generating projects; application & resume assistance; job aptitude testing; and occupation & labor force information.

___ **Education:** includes information, referral & follow-up; counseling & guidance; public information & information regarding issues associated with lack of education & poverty; head start support; day care & parenting information; alternative educational measures; literacy projects; adult basic education; bi-lingual education; and early childhood development.

___ **Housing (non-emergency):** includes information, referral & follow-up; homeowner counseling; loan assistance; landlord/tenant issues; rental & mortgage assistance; utility assistance; home repair; home rehabilitation & weatherization assistance; and home energy conservation.

___ **Making Better Use of Available Resources:** includes personal, household & financial counseling; energy conservation activities; community resource directories; alternative energy services; consumer education; food cooperatives; family planning services; language translation; removal of barriers to self-sufficiency achievement; dispute mediation; and promotion of low-income people for local associations/groups.

___ **Emergency Assistance:** includes crisis intervention activities; financial assistance; food assistance; clothing assistance; medical assistance; shelter assistance; other immediate urgent needs & issues; and Alast resort@ services.

___ **Nutrition/Food (non-emergency):** includes home-delivered meals; congregate meals; food processing; food banks; garden projects; surplus food distribution; and nutritional education.

___ **Linkages With Other Programs:** includes information, referral & follow-up; local needs assessments; community outreach services; resource directories; multi-planning & coordination with other agencies; transportation assistance; improvement of coordination & cooperation with all public and private agencies; and other services/activities that complement or supplement (*not supplant*) those activities of other agencies to fill identified gaps in service levels and to prevent duplication of services.

Name of Your Agency:_____

Agency Address:_____

Contact Person & Telephone Number:_____

(2) How well are these needs being met in your geographical area?

	Good	Fair	Poor	Not at All
Employment:	()	()	()	()
Education:	()	()	()	()
Housing:	()	()	()	()
Making Better Use of Available Resources:	()	()	()	()
Emergency Assistance:	()	()	()	()
Nutrition/Food:	()	()	()	()
Linkages with Other Programs:	()	()	()	()

(3) How well does your community meet the needs of: *

Helping low-income people become more self-sufficient?	()	()	()	()
Improving the conditions in which low-income people live?	()	()	()	()
Providing low-income people with a stake in their community?	()	()	()	()
Achieving partnerships among supporters and providers of services to low-income people?	()	()	()	()
Increasing the capacity of agencies to achieve results?	()	()	()	()
Strengthening family and other supportive systems to help low-income people achieve their potential?	()	()	()	()

*** Refer to the AStrategic Planning@ Section in the State Plan narrative for more specific definitions of the six national ROMA Goals.**

THE PLANNING PROCESS

Although all planning functions are important, no planning function is more important or critical than needs assessment (also called Problem Identification). The identification of problems to be resolved through the allocation of available resources and the delivery of social or human services is the key to planning tasks and functions.

In a needs assessment, the problems of the community and its people are identified. Once problems have been identified; (1) goals and program and service objectives can be set to solve those problems, (2) programs can be developed to obtain the desired objectives and thereby meet the identified needs, and (3) resources can be identified to finance those activities which have a potential for impacting the identified problems.

The best way to view needs assessment would be to see it as a method of identifying people's problems. Human needs are difficult to quantify and often rely on problem surveys and other techniques that measure perceived needs. Therefore, needs assessment is really a study of people's problems as they see them and, from these survey results, needs are inferred.

Conducting a community needs assessment is the logical first step in the planning process. While local agency personnel often know a great deal about the needs that exist in the community, a well-conducted needs assessment is a necessary tool for proving the need, and to justify funding for programs that can impact or solve the identified problems.

Needs assessment surveys generally measure one of two possible occurrences: (1) a determination of which of the various services currently offered meets the largest need; or (2) a determination of what types of services people need, whether or not that service is currently provided. The first type is most useful where the data will be used to make decisions regarding the most appropriate allocation of available resources among existing agencies. The second type is used to assess whether existing services are appropriate to meet the needs of the community, toward determining what kinds of services to provide in the future.

Once problems have been identified, decision-makers have a better insight toward establishing community needs. In short, a statement of need is the solution to the identified problem. *For example, where the Identified Problem is the inability to provide adequate food for one's children, the Statement of Need might be to be able to provide adequate food for children, and the Goal of problem-solving activities could be to assist people in providing food for their children.*

A wide variety of potential activities can be conducted toward meeting that Goal; including Food Stamps, home-delivered meals, congregate meals, soup kitchens, income supplementation, commodities, and other feeding programs. Each of these may be a viable alternative and, through prioritizing, good decisions can be made as to the activity which will accomplish the most for the least cost.

The sheer magnitude of needs in a community is often so overwhelming that public agencies and private sector organizations lack adequate resources to meet them. Further, community needs are so interrelated that it becomes difficult to define them distinctly, much less rank them in a manner that is acceptable to all involved in community problem-solving. However, it is cardinal to effective use of minimal resources that an assessment of needs be conducted to give direction and purpose to local planning efforts.

A side benefit of community needs assessments is that it serves as a catalyst to local coordination and cooperative efforts. Private and public service organizations justify their existence in terms of meeting community needs. Working closely together in a highly coordinated manner is a reasonable way to cut costs and increase efficiency and effectiveness.

Historically, some cooperative ventures fail, and community planners should be aware of some Astumbling blocks@ that have been unsuccessful in the past. One such pitfall is *over-sophistication*, where well-meaning planners try to reach beyond their grasp, armed with highly technical and sophisticated management tools that are beyond the understanding of those who must conduct and manage the problem-solving activities. We have found that simple systems work better in small communities, where people talk to each other on a day-by-day basis.

Another potential pitfall is *over-planning*, where so much effort is put into the planning of an activity, that there are no resources (either financial or personal) left for doing the work. A third hazard is *over-structuring* a necessary activity and, thereby, making it so inflexible that important changes cannot be made. In short, planning is absolutely necessary but, if planning efforts are not ultimately translated into action, the problems that exist will not be solved.

Simply put, a good needs assessment is no more than an organized way of studying people=s problems as they see them. Once the degree and prevalence of community problems have been identified, the needs inferred, and the gaps between needs and resources made clear; then decision-makers usually have a large range of possible strategies or activities available to solve those problems.

Wyoming people often warn against Areinventing the wheel.@ There is no harm, and great good, in taking advantage of information that has already been compiled to assess community needs at minimal costs. Much data already exist in state, county or municipal governments, through the University of Wyoming and Community Colleges, local planning agencies, crisis-line telephone logs, information and referral systems, agency caseload data and U.S. Census figures. A review of existing information sources will lead to some tips about target populations and techniques for the study. Generally, needs assessments will involve surveys of one or more of the following groups:

X Community Forums - This involves a series of well-publicized public meetings where issues are presented and public comments are solicited. The advantages to this approach are that they are easily arranged and inexpensive. Disadvantages are that they often attract only people with vested interest who may use the forum for personal, rather than community, good. This may, however, be the best approach for small communities; and may be linked with other approaches to minimize bias.

X Key-person Surveys - This involves the use of a questionnaire to key people in the community who have specific interest and/or knowledge in the purposes of the study. These key people may be elected officials, planners, agency personnel, clergy, physicians, etc. It is among the easiest and lest costly forms, but may not adequately represent the community as a whole. The simplicity and rapid turnaround time is appealing where time and cost are major factors, or where initial information is needed to support requirements for local funding applications.

X Client Surveys - This involves interviews or questionnaires to clients, and may involve all clients, a random sample, or selected subgroups (such as the elderly, low-income, disabled, unemployed, single parents, etc.) This approach is easy as it involves a captive population. There may be confidentiality concerns and it will not be

representative of the community at large. Confidentiality issues can often be overcome by not using the clients' names or personal information, or by asking for voluntary participation.

X General Population Surveys - This involves sample data from the population at large. Samples must be carefully selected to maintain any validity as a representative sample. When done correctly, it is the most scientifically valid approach. However, it is generally the most costly and difficult to implement.

X Social Indicators Approach - This involves gathering existing data and inferring needs based on that data. Population data includes demographics on race, sex, income levels, substance abuse, mortality rates, disabilities, sub-standard housing, homelessness, teenage pregnancy, incidence of crime, nutrition or food and medical needs, which are all related to service needs. This is less costly than most because much of the data already exist. However, the results are theoretical only and tend to be vulnerable to questions of validity.

X Services Being Provided - This involves reviews of case/client records and is a variation of the client survey. Because it uses available data its cost is low; and it offers an excellent overview of services currently being provided within the community. Confidentiality can be a problem if not handled wisely, and the bias found in Client Surveys exists.

The approaches listed above are by no means the only acceptable methods of gathering data for community needs assessments. Surveys should be developed on the basis of what approach or combination of approaches works best for your community. As you move from Problem Identification to the potential for solution, these are some questions you may wish to consider:

- X What are the specific goals and objectives of the needs assessment study?
- X What specific resources are available to you?
- X What specific information do you need to collect that is already available from existing sources?
- X What limitations are imposed (i.e. time, cost, administrative barriers, community attitudes, political obstacles)?
- X What target groups/techniques are best for data collection?
- X How (and by whom) are the survey forms developed?
- X How will the study be designed and controlled?
- X Will training be necessary for interviewers and others?
- X How will the instruments be tested to be sure they are clear, understandable, and useful for your purposes?
- X How will the data be processed into information and reported?
- X What uses will be made of the reported information?
- X What are the realistic deadlines to set for each step?

As interview forms and related materials are being developed, discussion and negotiations among all appropriate agencies and organizations will need to occur. Many diverse interests will be represented, and must be incorporated so that activities can be conducted as a joint effort.

The next step will be implementing the detailed plan. This may involve training of people to conduct studies, field-test survey instruments, monitoring and supervision of people who will be collecting the responses, do the follow-up required to collect data, and compile data into useful information.

A following step (which may be run concurrently with earlier steps) is to identify community resources. This involves an inventory of manpower, equipment, goods, services, facilities, supplies, funding, time, and services available within the community. Again, this step should be conducted in harmony with all organizations and agencies in the community. Some questions to ask may be:

- X What is the purpose of the agency or program?
- X What specific services are provided?
- X Who is eligible to receive the services, and what is the specific criteria to receive the services?
- X How many people is the agency capable of serving?
- X What is the size of the staff and what are they capable of doing (what are their qualifications)?
- X What organization patterns are there?
- X What physical facilities are available?
- X What is the legal authority to deliver services?
- X What referral procedures are used (both referrals Ato@ and Afrom@ the agency)?
- X What is the service delivery area?
- X What are the sources and amounts of funding?
- X What are the anticipated uses of service by clients/customers?
- X What equipment, supplies, or materials are available?
- X What constraints does the agency face in providing services?

In order to build stronger coordination and cooperation among all local agencies (both public and private sector), it will be useful to (1) identify flexible resources that each agency might pool with others to meet unique needs; (2) identify specific legal or regulatory barriers that prevent coordination with other agencies or make it difficult to serve clients not commonly served by that agency, and (3) identify existing contractual agreements or working relationships among community agencies, their purposes, and their potential impact on your efforts to build interagency coordination and cooperation. **If sound coordination and cooperation systems are not in place among all concerned, then the needs assessment study has virtually no chance of being developed and completed.** The journey from needs assessment to project evaluation generally follows these steps:

- (1) Identification of problems in need of solution (needs assessment)
- (2) Prioritizing potential solutions
- (3) Selecting the most practicable solution
- (4) Setting goals, objectives, etc. (*WyoROMA* criteria)
- (5) Inventorying existing resources
- (6) Requesting additional resources (grant application)

- (7) Implementing projects
- (8) Reporting activities and achievements
- (9) Assessing efficiency & effectiveness (evaluation)

For those activities that require federal CSBG funding assistance through the Wyoming Community Services Programs (CSP), there are specific criteria that must be met. Among those criteria are:

- The six National Goals set by the CSBG National Task Force on Monitoring and Assessment;
- Components of the Wyoming Strategic Plan;
- The Results-Oriented Management and Accountability (ROMA) System elements.

The State of Wyoming has developed and utilizes as its primary management tool, a strategic planning process as authorized by Wyoming Statute (WS 28-1-115). As part of the Strategic Planning Process, and to assist local participants in developing Goals, Objectives, Strategies, Outcomes, and Outputs, the Community Services Programs have developed a set of definitions, which follow:

Goals: A **goal** is the general end toward which efforts are directed, and addresses the primary issue or problem to be solved. It is both qualitative and quantifiable, but need not be quantified (measurable).

Objectives: An **objective** is a clear target for specific action. It is linked directly to the goal and is quantified (measurable) as a time-based statement of intent, emphasizing the results to be achieved by that action at the end of a specific time.

Generally speaking, for purposes of consistency, goal and objective statements begin with the word ATo. Every program must have at least one goal and one objective, but may have more than one or may have multiple objectives that address a single goal.

Results: A **result** is an indicator of the actual impact or effect of an action on a stated condition or problem. It is a tool to assess the effectiveness of an action and/or the public benefit to be derived from that action. It is typically expressed as a percentage, rate, or ratio.

Measures: A **measure** is a tool for counting the services and good produced through an action. The number of people receiving a service and the number of services delivered are often used as output measures.

Strategies: A **strategy** is a method for achieving goals and objectives. It is used to demonstrate the process for transforming inputs(activities) into outputs (achievements) and ultimately into outcomes (results) that cause the objectives, and ultimately the goals, of a program to be accomplished. It reflects cost/benefits and best use of financial and other resources, or a chronology of activities.

Through the Results-Oriented Management and Accountability (ROMA) System presented by the U.S. Department of Health and Human Services (DHSS), Office of Community Services (OCS); the following definitions were developed by the Rensselaerville Institute:

Outcome Statement: An inspiring statement that defines the broad end state sought in customer terms (i.e., self-sufficiency, graduates and gets a job with career potential, etc.)

Performance target: Defines success for your program in terms of what the customer will actually achieve (Get & keep employment for 1 year).

Milestones: Specifies actions, the steps, the small changes along the way most customers will need to take to reach performance target.

Generally speaking, the ROMA Outcome Statement includes the word Aall@ and the Performance Target identifies what portion of that total will be achieved. ROMA also uses Total Quality Management terminology, including references to ACustomers@ rather than AClients.@"

The Wyoming Community Services Programs have developed and utilize as a management tool for all CSBG participants, a system that coordinates the components of both strategic planning and the federal CSBG ROMA and that addresses the six federal CSBG National Goals. Using that system, local CSBG Program participants will submit applications and report in a manner that is compatible to the state=s WyoROMA system.

Detail regarding this management system can be found in this Section; forms and instructions can be found in the Section entitled AFinancial & Performance Reporting@; and a general overview of the WyoROMA system can be found in a section entitled AThe Planning Process.@" It is the intent of the Wyoming Community Services Programs to continually update the WyoROMA system to keep it dynamic, and to provide state-wide WyoROMA training as requested or deemed necessary.

Through this system, following problem identification and as a part of a community needs assessment, applicants requesting CSBG funding assistance will identify specific projects or activities that are in need of funding through the CSBG Program. Goal, Objective, Priorities, Measures and Strategies statements pertinent to the WyoROMA will be identified by the applicants. In addition, the applicant will indicate which of the six National Goals would be impacted through completion of the activity being conducted.

For example, if ACommunity A@ requests funding for a local activity which would provide job training to an estimated 75 unwed mothers who are expected to place their babies for adoption; the evaluation criteria might look like the following:

WyoROMA Reporting Criteria

Name of Your Agency: Community A Women=s Shelter

Agency Address: 1234 Shelter Avenue, Community A, Wyoming

Contact Person & Telephone Number: Project Coordinator - (307) xxx-xxxx

Project or Activity: Community A Women=s Shelter Job Training Project

GOAL: To move unwed mothers toward self-sufficiency following decisions to place babies for adoption.

OBJECTIVE: To provide job training education to seventy-five unwed mothers who have decided to place their babies for adoption during FFY 2009.

RESULTS: To graduate 40% of eligible applicants for job training instruction.

MEASURES: 200 potential unwed mothers involved in Women=s Shelter Programs.
100 potential unwed mothers placing their babies for adoption.
75 potential job training instruction students.

STRATEGIES: To utilize an accredited job training procedure for unwed mothers who (1) decide to place their babies for adoption, (2) volunteer to devote themselves to the discipline of the job training procedure, and (3) complete the training to the satisfaction of the instructor.

WyoROMA Reporting Criteria

Page 2

Project or Activity Community A Women=s Shelter Job Training Project

Which of the six National Goals will be impacted by this project/activity?

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| 1) Helping low-income people become more self-sufficient? | (X) |
| 2) Improving the conditions in which low-income people live? | () |
| 3) Providing low-income people with a stake in their community? | () |
| 4) Achieving partnerships among supporters and providers of services to low-income people? | () |
| 5) Increasing the capacity of agencies to achieve results? | () |
| 6) Strengthening family and other supportive systems to help low-income people
(especially vulnerable populations) achieve their potential? | () |

Progress Toward Objective:

Grant Period: _____ For Month of: _____

This month

Year to Date

Number of Clients Served:

Unduplicated Number of Clients Served:

WyoROMA Reporting Criteria
PAGE 1

Name of Your Agency:_____

Agency Address:_____

Contact Person & Telephone Number:_____

Project or Activity:_____

GOAL:

OBJECTIVE:

RESULTS:

MEASURES:

STRATEGIES:

WyoROMA Reporting Criteria
Page 2

Which of the six National Goals will be impacted by this project/activity?

- 1) Helping low-income people become more self-sufficient? ()
- 2) Improving the conditions in which low-income people live? ()
- 3) Providing low-income people with a stake in their community? ()
- 4) Achieving partnerships among supporters and providers of services to low-income people? ()
- 5) Increasing the capacity of agencies to achieve results? ()
- 6) Strengthening family and other supportive systems to help low-income people (especially vulnerable populations) achieve their potential? ()

Progress Toward Objective:

(Relative to the Measures identified on Page 1)

Grant Period: _____ For Month of: _____

	<u>This month</u>	<u>Year to Date</u>
Number of Clients Served:	_____	_____
Unduplicated Number of Clients Served:	_____	_____

CSBG BUDGET SUMMARY

Section I: Applicant Information

Agency Name: _____

Address: _____

Contact Person(s) & Telephone Number: _____

Budget Period: From: ____ / ____ / ____ To ____ / ____ / ____

Submitted as part of (check one): ____ Funding Request ____ Amendment Request

Section II: Budget Summary Detail

COST CATEGORIES	CSBG FUNDS	OTHER FUNDS	COMBINED FUNDS
PERSONNEL SVCS			
Salary & Wages			
Employer Paid Benefits			
SUPPORTIVE SVCS			
Communication			
Telephone			
Postage			
Travel In-State			
Travel Out-of-State			
Supplies			
Consumables			
Commercial Printing			
Publications			
Equipment Purchases			
Real Property Rental			
Equipment Rental			
GRANTS-IN-AID			
CONTRACTUAL SVCS			
Sub-Total			
Indirect Costs			
GRAND TOTAL			

Section I: Applicant Information

Address:_____

Budget Period: From: _____ / _____ / _____ **To** _____ / _____ / _____

Section II: Salaries and Wages Detail

[illegible]

CSBG BUDGET NARRATIVE

	CSBG Funds	Other Funds	TOTAL:
Direct Costs ***			
Indirect Costs **			
Administrative Costs *			
TOTAL:			

Description of expenditures included by category:

Direct Costs: _____

Indirect Costs: _____

Administrative Costs: _____

* Administrative costs are those personnel expenses (usually at a subcontractor (service provider) level) that are necessary to support activities (Direct costs) that are conducted utilizing CSBG funding.

** Indirect Costs are generally at the contractor (Tripartite Board) level, and are used to provide oversight (such as planning and monitoring) of CSBG funded activities (Direct costs).

*** Direct Costs are those that can be identified directly with delivery of a particular project, service, or activity to achieve a desired outcome.

(See Administrative Costs@ Section of State Plan for details)

FINANCIAL & PERFORMANCE REPORTING

In order to simplify monthly financial and performance reports to the state, Community Services Programs (CSP) contracted with CMA Technologies to develop and the Wyoming cmReporter database which was implemented in FFY 2009. Each Tripartite Board (including Community Action Partnerships) must submit monthly reports to Community Services Programs using this web-based reporting instrument. Use of cmReporter will help insure the accuracy of reports from service providers and will allow Tripartite Board coordinators to more readily review and compile reports from subcontracting entities and forward them to CSP.

Preparation

To use Wyoming cmReporter to submit your CSBG reports to CSP you should have broadband (high speed) access to the Internet and the setting for your Windows Desktop needs to be higher than 800 x 600 pixels. (See your tech or contact CSP for assistance.) There will be an icon (shortcut) on the Desktop of the computer used for reporting to CSP with cmReporter. (Your tech can create the shortcut if it does not exist.)

There is only one Wyoming cmReporter *user name* assigned to each county Tripartite Board coordinator. User names and passwords will be assigned upon request to Community Services Programs. Sub-contractor information will be entered by the county coordinator under their assigned user name and password, which can be obtained from CSP.

Log on

When you click on the Wyoming cmReporter shortcut it will open the screen welcoming you to your CSBG reporting system. You will be instructed to enter your user ID and password. When you enter your agency user name and password and click the logon button a screen will open displaying the list of Programs on which you are to report. [In the unlikely event this list is not correct, please contact CPS.]

Using Wyoming cmReporter

The reporting screen will display your agency name, a small box for selecting the current reporting period (month and year) and a larger box listing all the Programs you are to report on. Select the correct reporting period from the lookup table by using the down arrow at the right of the Reporting Period box. All of your Programs will be designated *Incomplete* the first time you access this screen for the current reporting period.

To prepare a report highlight one of the Programs by clicking the arrow to the left of the Program's name and then click Edit. In a few seconds the *Monthly Report of Expenditures* form will be displayed. Your agency name, the program name and the reporting period will be shown at the top of the form.

Simply enter your expenditures for the month in the column titled, *Month EXP*. The YTD totals will be calculated for you. Next enter the number of Services Provided or the People Served near the bottom of the form. The number of services provided and/or people served should be compatible to the *WyoROMA* projections that were included in your initial application for funding. This will provide for an internal review of your monthly progress toward the measures you had identified. For example, if you had anticipated providing 500 healthy meals during the fiscal year and your March data shows that only 50 had been served, that should alert you to a potential unmet need, or a need to move funds from one project to another for best use of the limited funds that are available. Likewise, if your *WyoROMA* criteria identified providing educational materials to 500 people, and March data show that only 25 have taken advantage of the educational opportunities, you should be alerted to review the reasons for the low numbers and make adjustments as necessary. Complete the form by filling in the Title of Person Completing Form and Name of Person Completing Form. The date will be assigned automatically. Click the Save button to save your

report. Click Close and note that the status is now ***Waiting for submission***. Continue completing the reports for all of your Programs.

To edit a report that has not yet been submitted to CSP, simply access the form again and change the report by overwriting the data.

All Program reports that your agency is responsible for must be submitted to CSP at the same time. *Once a report has been submitted, you will not be able to edit it further unless that report has been returned to you by CSP.*

When you have completed all your reports and are ready to submit them click the Submit All button. The current status will change to ***Submitted for review***.

Make sure that you have completed all of your reports before you click ***Submit All*** since you will not be able to make any changes to a report after submitting it unless CSP rejects it.

To summarize: Prior to preparing a Program report the Current Status for that Program will be ***“Incomplete”***. Once you edit and save the report the status will change to ***“Waiting for submission”***. After you submit your reports the status becomes ***“Submitted for review”***. After submission the Save button is grayed out and you will not be able to make further changes to the report.

You can print a report at any stage of this process. At the bottom of the form there is a Print button that takes you to the form for printing. Alt R will preview the form and Ctrl P will print it. To return to the report form, use the Back arrow button in the form header.

Please do not hesitate to contact CSP with any difficulties in providing timely reports. The purpose of this system is to make monthly reporting simpler and more efficient without losing the importance of accurate reporting of expenditures and activities for your programs.

After Submission

In the event CSP rejects one or more of your reports you will be notified, and you will be able to edit any reports that have been rejected.

Upon notification that one of your reports has been rejected the status for that Program will now display ***“Rejected”*** and you will be able to edit it for resubmission.

After editing all Programs that have been rejected, click Submit All. Assuming that CSP now accepts your new report(s) the status will display ***“Approved.”***

Summary Report

By highlighting any one of your programs and selecting the **Report** button, it automatically selects all programs for the Tripartite Board and prepares a summary report for the month selected in the date lookup dropdown box.

CLIENT OR APPLICANT APPEAL PROCESS

(Page 1 of 2)

Any substantive decision or action by a state recipient or non-profit recipient (local government or private non-profit organization) which an applicant for program services, or a program client, believes to be unfair or unreasonable, and having a major adverse impact upon the applicant/client, may be appealed by the applicant/client to the State.

It is expected that the applicant/client will first of all utilize the local program's appeal process. If, after that process is completed and the applicant/client still believes that they want to pursue the appeal, the applicant/client may utilize the following State appeal process. Such process is as follows:

- (1) With fifteen (15) days of the local program's decision, which is believed by the applicant/client to be unfair or unreasonable, the applicant/client believing himself or herself to be aggrieved, must submit a letter to the Community Services Programs, Department of Health, setting forth:
 - (a) the decision or action that is in issue;
 - (b) the date on which the applicant/client received notice of the decision or action by the local program (recipient);
 - (c) the rationale for considering the decision or action to be substantive and unfair or unreasonable to the applicant/client; and
 - (d) the request for such a State hearing, including the applicant/client's desired outcome of such a hearing.
- (2) Within ten (10) working days of the receipt of the request for a hearing, the Community Services Manager shall determine whether the complaint sets forth the facts that constitute a substantive action by the Division which has a major adverse impact on the applicant/client.
 - (a) If the determination is that the complaint does not meet the preceding criteria, the Community Services Manager shall notify the appellant (applicant/client) within ten (10) working days of the request for hearing.
 - (b) If the determination is that the complaint does meet the appeal or hearing criteria, then the Community Services Manager will identify the hearing officer, schedule the hearing date no later than thirty (30) days hence, and so notify the appellant (applicant/client).
- (3) Prior to the scheduled hearing, the Community Services Manager will contact the appellant (applicant/client).
 - (a) to obtain additional information pertinent to the issue;
 - (b) to clarify any misunderstanding;
 - (c) to explore possible alternatives which would eliminate the necessity for a hearing; and
 - (d) to obtain a written withdrawal of the request for a hearing if the issues have been resolved.

CLIENT OR APPLICANT APPEAL PROCESS

(Page 2 of 2)

- (4) The hearing will be conducted by the Community Services Manager. The appellant (applicant/client) will have the right to be represented by counsel at the hearing, but must notify the Community Services Manager at least ten (10) working days prior to the hearing that counsel will be present.
- (5) The hearing officer will review all information and evidence presented at the hearing, as well as information gathered from the program (recipient), and will recommend a decision to the Community Services Manager, who will issue a written decision of the appeal within thirty (30) days of the hearing.
- (6) The decision resulting from the State hearing will be a final appellant (applicant/client) action.

The hearing will be held in Cheyenne, or at a location more convenient to the appellant (applicant/client), whenever financial and time constraints allow, at the discretion of the Community Services Manager.

GRANTEE/SUBGRANTEE APPEAL PROCESS

(Page 1 of 2)

Any substantive decision or action by a state recipient or non-profit recipient believed to be unfair or unreasonable, and having a major adverse impact on its local program may be appealed by the state recipient or non-profit recipient. The appeal is as follows:

- (1) Within fifteen (15) days of the State's decision, which is believed to be unfair or unreasonable, the recipient believing himself to be aggrieved must submit a letter approved by their governing board and signed by the board chairperson (in the case of non-profit recipients), and in the case of local governments, a letter signed by its local elected officials, i.e.--county commissioners, to the Community Services Programs, Department of Health, setting forth:
 - (a) the decision or action that is in issue;
 - (b) the date on which the recipient received notice of the decision or action;
 - (c) the rationale of the board for considering the decision or action to be substantive and unfair or unreasonable to the recipient; and
 - (d) the request for such a hearing, including the desired outcome of such a hearing.
- (2) Within ten (10) working days of the receipt of the request for hearing, the Community Services Manager shall determine whether the complaint sets forth the facts that constitute a substantive action by the Division which has a major adverse impact on the recipient's program.
 - (a) If the determination is that the complaint does not meet the preceding criteria, then the Community Services Manager shall notify the appellant agency within ten (10) working days of a denial of request for a hearing.
 - (b) If the determination is that the complaint does meet the appeal or hearing criteria, the Community Services Manager will identify the hearing officer, schedule the hearing date no later than thirty (30) days hence, and so notify the appellant agency.
- (3) Prior to the scheduled hearing, the Community Services Manager will contact the Board chairpersons of the appellant agency:
 - (a) to obtain additional information pertinent to the issue;
 - (b) to clarify any misunderstanding;
 - (c) to explore possible alternatives which would eliminate the necessity for a hearing; and
 - (d) to obtain a written withdrawal of the request for a hearing.
- (4) The hearing will be conducted by the Community Services Manager. The appellant will have the right to be represented by counsel at the hearing, but must notify the Community Services Manager at least ten (10) working days prior to the hearing that counsel will be present.
- (5) The hearing officer will review all information and evidence presented at the hearing and will recommend a decision to the Community Services Manager, who will issue a written decision of the appeal within thirty (30) days of the hearing.

GRANTEE/SUBGRANTEE APPEAL PROCESS

(Page 2 of 2)

- (6) The decision resulting from the State hearing will be a final recipient action.

The hearing will be held in Cheyenne, or at a location more convenient to the appellant agency, whenever financial and time constraints allow, at the discretion of the Community Services Manager.

State of Wyoming - Community Services Programs
Community Services Block Grant (CSBG) Program

Request For Proposal: CSBG Set-Aside 2009-10

I. BASIC INFORMATION

A. Date: _____,

B. Subject: FY 2010 CSBG Set-Aside Funds

This Request for Proposal (RFP), issued by the Community Services Programs, Department of Health, relates to the use of federal funds made available to the State for Federal Fiscal Year 2010. The enabling legislation for the program is the Community Services Block Grant (CSBG) Act (Title VI of the Omnibus Budget Reconciliation Act of 1981; Public Law 97-35), as amended. Under the terms of this RFP, the State will accept proposals for the use of CSBG funds in the state for the period beginning March, 2009.

The total amount of funds available for FFY 2010 under this RFP is _____.

C. Compliance with the Act, its Amendments, and Implementing Regulations.

This RFP has been written in accordance with the provisions of the CSBG Act, its amendments, and implementing regulations, and the FFY 2010 CSBG State Plan. The State reserves the right to cancel or amend this RFP in any manner it deems necessary if changes are made in the Act or its regulations after such date. All proposals must be consistent with the requirements of the CSBG State Plan.

D. Closing Date

Proposals for use of the funds available under the terms of this RFP must be postmarked on or before **March 15, 2010**. Proposals received with a postmark after **March 16, 2010** will not be considered for funding.

E. Applicable Grantees

This RFP is intended for use for competitive bids, for CSBG Set-Aside funds, not regular CSBG entitlement funds. Priorities for applications generally will include the following:

- S Unanticipated and/or unmet needs that could be realistically addressed by Set-Aside funds;
- S Welfare reform coordination;
- S Priorities established in the local respective Community Action Plan which were not adequately funded nor addressed with ARegular@ CSBG funds;
- S Emergency and/or disaster situations;
- S Improvement of the coordination, networking and working relationships with the CSBG and other related human services programs, both in the public and the private sectors;
- S Research and information capabilities relating to poverty issues;
- S Advocating for planning, coordinating, and assessing the needs and problems of low-income people through educating the general public, state and local officials, and the private sector, for the ultimate purpose of mobilizing resources to better combat poverty conditions in communities;

- S Forums at the state or local levels whereby low-income people can participate in the governmental process, i.e., governing boards, planning groups, advisory councils, and other such organizations;
- S Encouragement of the private sector in the coordination process, the forum and problem solving process, and in resource mobilization;
- S Provision of training and technical assistance to local CSBG contractors and/or service providers, and related community-based organizations;
- S Seed money for new projects that combat unmet needs (however, CSBG funds cannot be used as matching funds for other funding sources, per federal law).

F. Program Purpose

The State will use CSBG funds to assist low-income persons in the pursuit of self-sufficiency.

G. Program Goal

As required under the terms of Section 675(c) of the Act, CSBG-funded activities will have "...a measurable and potentially major impact on causes of poverty..." in the state. The Goal is to provide a range of services which will enable low-income persons to:

1. find meaningful employment;
2. attain an adequate education;
3. make better use of their income;
4. obtain adequate housing;
5. obtain emergency assistance;
6. overcome barriers to self-sufficiency;
7. achieve greater participation in civic affairs;
8. make more effective use of other related programs;
9. counteract conditions of malnutrition;
10. enjoy improved interagency coordination; and
11. benefit from better use of the private sector.

More specifically, CSBG funds will be used to identify and eliminate causes of the following poverty-related issues:

1. A disproportionate percentage of low-income persons are unemployed;
2. A disproportionate percentage of low-income persons have had less than an average amount of formal and informal education;
3. Low-income persons do not always make effective use of their available;
4. A disproportionate percentage of low-income persons live in poor quality housing;
5. Low-income persons are not always able to meet their emergency needs, particularly those that are food-related; and
6. Low-income persons do not always make effective use of public and private programs and services.

H. Timetable for Set-Aside Funds

May 1, 2010 will be the earliest possible date for contract awards under the terms of this RFP. Funds awarded under this RFP *must* be expended by September 30, 2010.

I. Sponsors and Qualifications

These funds are being made available for programs with exceptional needs coupled with a serious shortfall of funds as State 10% Set-Aside Funds.

II. RESPONSE PROCESS

A. General Information

It is the intent of the State that the application process for CSBG Set-Aside funds be open and fair and that funds be allocated in a manner that provides the greatest possible benefits for Wyoming's low-income residents. To ensure that this occurs, State staff should be available to respond to inquiries about it or related matters. The Community Services Programs staff are located at 6101 Yellowstone Rd., Ste. 510, Cheyenne, Wyoming 82002. Jim Rolf, Assistant Community Services Manager, may be reached by telephone at 777-8652.

III. SCREENING PROCESS AND CRITERIA FOR REVIEW OF RFP PROPOSALS

A. Screening Process

The process will involve screening of responses by a review panel. All persons serving on such panels will have detailed knowledge of the subject areas for the responses they review, and will be absent of bias in terms of CSBG funding. After the panel rates each response, the Community Services Manager will make a final determination as to the applications that will receive funding and as to the level of funding that will be provided. Decisions made in this regard will be consistent with the requirements of the CSBG State Plan.

B. Screening Criteria

The following criteria will be used to assess proposals:

1. Involvement of targeted community residents in:
 - a. Planning
 - b. Program Development
 - c. Program Operations
2. Involvement of non-targeted community residents in:
 - a. Planning
 - b. Program Development
 - c. Program Operations
3. Extent to which the participants in the program will be low-income persons.

4. Self-sufficiency potential:
 - a. For participants
 - b. For programs in the absence of CSBG funds
5. Evidence of coordination and linkages with related public and private agencies, and evidence that CSBG-funded activities will not duplicate other efforts.
6. Impact on and relationship to State CSBG program goals, objectives, outcomes, principles, and assumptions.
7. Technical approach:
 - a. Clarity of goals and the extent to which goals appear to be reasonable and cost effective.
 - b. Likelihood that the methods and activities described will result in goal achievement.
 - c. Extent to which the activities proposed can be effectively monitored and evaluated.
 - d. Use of ROMA principles in defining Outcomes.
8. Degree to which the proposed budget is reasonable and appropriate, notably regarding administrative costs as opposed to client service costs.
9. Agency or organizational capacity in terms of:
 - a. Personnel management
 - b. Fiscal management
 - c. Governing board operations
 - d. Planning
 - e. Program Operations
 - f. Civil rights
10. CSBG 10% Set-Aside Funds awards will also strongly utilize the historical record of the prospective project's ability and willingness to submit the required monthly financial and performance reports and end-of-the-year final reports to the Community Services Programs on a timely basis as required. Projects that can show a historical record of submitting timely reports will receive priority over those that have shown the inability to comply with the reporting requirements.

C. Screening Criteria Definitions

The following information is included to clarify the intent of the Division regarding the screening criteria outlined above:

1. Involvement of Targeted Community Residents - As indicated in the State CSBG Plan, the State has a strong interest in promoting citizen involvement in CSBG program activities. The involvement of targeted residents is of particular concern as this serves to promote their

self-sufficiency. Accordingly, proposals should include a brief narrative that describes how target area residents have been and will be involved in CSBG activities.

2. Involvement of Non-Targeted Community Residents - As is indicated in the State CSBG Plan, the involvement of non-targeted community residents in CSBG activities will be a key element of CSBG programming in Wyoming as this will meet the requirements of the CSBG Act in terms of building public and private program linkages, improving program coordination, and promoting the involvement of the private sector in efforts to combat poverty. Accordingly, responses should include a brief narrative concerning the extent of involvement.
3. Targeted population Composition - It is the intent of the State that the targeted population be low-income persons. Accordingly, responses should indicate both the extent to which low-income persons will be the targeted population for CSBG-funded activities and the procedures that will be used to monitor accomplishments in this regard.
4. Self-Sufficiency Potential for Participants - It is the intent of the State that CSBG funds be used for activities that promote the self-sufficiency of low-income persons. The central element in determining the degree to which an application promotes self-sufficiency for participants will be the extent to which the antipoverty strategies it contains hold direct promise of eliminating causes of poverty-related problems.
5. Self-Sufficiency Potential for Programs - The State is not interested in promoting dependency on CSBG funds on the part of either program sponsors or program participants. Accordingly, responses should describe how this will be avoided.
6. Evidence of Coordination and Linkages - The State will not fund proposals that duplicate existing antipoverty efforts. The State is interested in promoting program coordination and linkages whenever possible. A response that describes activities that appear to be duplicative of other programs should provide evidence that duplication will not occur. Further, to the extent that it is not evident, activities that promote coordination and improve linkages should be so identified.
7. Impact on Relationship to State CSBG Program Purposes - No application will be funded that describes activities that are inconsistent with the purposes and objectives of the CSBG Program.
8. Technical Approach -
 - a. *WyoROMA* Criteria
 - b. Likelihood that methods and activities will result in goal achievement. The level of effort and course(s) of action described in responses should be on a scale and of a nature that will ensure that goals can be met.
 - c. Extent to which proposed activities can be monitored and evaluated effectively.

The goals and activities included in responses should be written in a manner that allows prospective sponsors to establish specific targets for both the completion of activities and for program results that are consistent with *WyoROMA* criteria. Information regarding the *WyoROMA* management system can be found as part of the FFY 2010 CSBG State Management Plan, which includes the “CSBG Operations Manual” as Attachment A of that plan.

9. Degree to which Proposed Budget is Reasonable and Appropriate - It is the intent of the State to have CSBG programs take place on a state-wide basis, and to have expenditures that clearly benefit low-income people. Budgets that accompany responses should be consistent with these intentions. They should also be reasonable and appropriate in regard to the relationship between their personnel and non-personnel costs and in regard to their administrative costs.
10. Agency and Organizational Capability - It is the intent of the State to provide funds only to sponsors that can and will use them effectively and efficiently. If it is necessary or desirable, prospective sponsors may include an organizational capability statement with their response.

IV. ADDITIONAL INFORMATION REGARDING PROPOSALS

A. Format

1. Applications must address all of the criteria contained in this RFP. The extent to which, and the clarity of the information presented in the proposals will be a substantial indicator for the proposal review committee in their deliberations.
2. It should be emphasized that there is no correlation between weight and length of proposals as opposed to those that present information in a clear and concise manner. Consequently, common sense and professionalism should prevail.
3. Detailed information regarding the CSBG can be found in the CSBG State Plan and the CSBG Operations Manual. It is imperative that these documents be perused before applying for funds under the terms of this RFP.

STATE OF WYOMING CSBG LOCAL APPLICATION CHECKLIST

	Responsibility:	
	Contractor	Service Provider(s)
<u>Public Input/Comment</u>		
Public Hearing	<input type="checkbox"/>	
<u>Local Assurances</u>		
Set of 12 Assurances	<input type="checkbox"/>	<input type="checkbox"/>
<u>Local Certifications</u>		
Environmental Tobacco Smoke	<input type="checkbox"/>	<input type="checkbox"/>
Drug-Free Workplace	<input type="checkbox"/>	<input type="checkbox"/>
Lobbying	<input type="checkbox"/>	<input type="checkbox"/>
Debarment/Suspension	<input type="checkbox"/>	<input type="checkbox"/>
Nondiscrimination	<input type="checkbox"/>	<input type="checkbox"/>
OMB Cost & Accounting Standards	<input type="checkbox"/>	<input type="checkbox"/>
Child Support Services & Referrals	<input type="checkbox"/>	<input type="checkbox"/>
<u>Community Action Plan</u>		
Community Needs Assessment	<input type="checkbox"/>	
Description of Service Delivery System	<input type="checkbox"/>	
Description of Linkages	<input type="checkbox"/>	
Description of Coordination	<input type="checkbox"/>	
Description of Outcome Measures	<input type="checkbox"/>	
<u>Planning Process (WyoROMA):</u>		
Strategic Planning	<input type="checkbox"/>	<input type="checkbox"/>
ROMA Components	<input type="checkbox"/>	<input type="checkbox"/>

Service Categories

National CSBG Goals

Program Fiscal Information

Budget Summary Form

Salaries/Wages Form

Budget Narrative

Reporting Requirements

Monthly Expenditure Report

Monthly WyoROMA Performance Report

Final CSBG Report

Information Systems (IS) Survey Data

National Performance Indicator Data

